

In The Matter Of:

EZRA SMITH vs.

DEPUTY MONIQUE TRACEY, DEPUTY RAUL GOMEZ, et al.

The deposition of EZRA SMITH

October 15, 2025

Ansley Court Reporting

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Min-U-Script® with Word Index

<div>Page 1</div> <div>UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION</div> <div> <div>EZRA SMITH,</div> <div>Plaintiff,</div> <div>VS.</div> <div>DEPUTY MONIQUE TRACEY, DEPUTY RAUL GOMEZ, DEPUTY SHÉNEQUA JACKSON, and ERICA SANCHEZ,</div> <div>Defendants.</div> </div> <div>CIVIL ACTION FILE NO.: 1:24-CV-05158-TWT</div> <p>The deposition of EZRA SMITH, taken for the purposes stated herein; all formalities waived, excluding the reading and signing of the deposition, before April D. Herbert, Court Reporter in and for the State of Georgia, commencing at 12:22 p.m., Wednesday, October 15, 2025 at the offices of Spears and Filipovits located at 315 West Ponce de Leon Avenue, Suite 865, Decatur, Georgia.</p> <div>ANSLEY COURT REPORTING, LLC Certified Court Reporters April D. Herbert, CVR 1579 Monroe Drive Suite F-342 Atlanta, Georgia 30324 (404) 210-6977 www.ansleycourtreporting.com</div>	<div>Page 3</div> <div>I N D E X</div> <div> <div>Page</div> <div>Examination by Mr. Veal</div> <div>Examination by Mr. Buckley</div> <div>Re-Examination by Mr. Veal.</div> <div>Examination by Mr. Waymire</div> <div>Re-Examination by Mr. Buckley</div> <div>Examination by Mr. Slater</div> </div> <div>5</div> <div>93</div> <div>126</div> <div>127</div> <div>163</div> <div>168</div> <div>E X H I B I T S</div> <div> <div>Exhibit</div> <div>Description</div> <div>Page Marked/ Identified</div> </div> <div> <div>D-1</div> <div>Screenshot of video</div> <div>135/135</div> </div> <div> <div>D-2</div> <div>Diagram of cell</div> <div>135/135</div> </div> <div>TRANSCRIPT CODES:</div> <div>-- interruption/change in thought</div> <div>... incomplete thought</div> <div>(sic) denotes word/phrase that may seem strange or incorrect has been written verbatim</div> <div>(ph) phonetically spelled</div> <div>(unintelligible) not capable of being understood</div>
<div>Page 2</div> <div>A P P E A R A N C E S</div> <div>ON BEHALF OF THE PLAINTIFF:</div> <div>SLATER LEGAL PLLC BY: JAMES M. SLATER, ATTORNEY AT LAW 2296 Henderson Mill Road, Northeast, #116 Atlanta, Georgia 30345 (404) 458-7283 Email: james@slater.legal</div> <div>SPEARS & FILIPOVITS LLC BY: JEFFREY R. FILIPOVITS, ATTORNEY AT LAW 315 West Ponce de Leon Avenue, Suite 865 Decatur, Georgia 30030 (404) 905-2225 Email: jeff@civil-rights.law</div> <div>ON BEHALF OF THE DEFENDANT TRACEY:</div> <div>HUFF POWELL & BAILEY LLC BY: ANTONIO E. VEAL, ATTORNEY AT LAW 999 Peachtree Street, Northeast, Suite 950 Atlanta, Georgia 30309 Email: aveal@huffpowellbailey.com</div> <div>ON BEHALF OF THE DEFENDANTS GOMEZ AND JACKSON:</div> <div>BUCKLEY CHRISTOPHER & HENSEL PC BY: TIMOTHY J. BUCKLEY III, ATTORNEY AT LAW 2970 Clairmont Road, Northeast, Suite 650 Atlanta, Georgia 30329 (404) 633-9230 (404) 633-9640, Facsimile Email: tbuckley@bchlawpc.com</div> <div>ON BEHALF OF THE DEFENDANT SANCHEZ:</div> <div>WILLIAMS & WAYMIRE BY: JASON C. WAYMIRE, ATTORNEY AT LAW 4330 South Lee Street, Northeast, Suite 400-A Buford, Georgia 30518 (678) 541-0790 (678) 541-0789, Facsimile Email: jason@wmwlaw.com</div>	<div>Page 4</div> <div>1 PROCEEDINGS</div> <div>2 12:22 p.m.</div> <div>3 (Whereupon, the Court Reporter</div> <div>4 complied with the requirements of</div> <div>5 O.C.G.A. §9-11-28(c).)</div> <div>6 MR. WAYMIRE: And I'm letting</div> <div>7 everybody know that it's video recorded.</div> <div>8 MR. VEAL: Okay.</div> <div>9 (Witness sworn.)</div> <div>10 MR. VEAL: All right. This is going</div> <div>11 to be the deposition of Ezra Smith, taken</div> <div>12 pursuant to notice and agreement of</div> <div>13 counsel. This case -- I mean this</div> <div>14 deposition is being taken for all</div> <div>15 purposes under the Federal Rules of Civil</div> <div>16 Procedure. As such, I would ask that all</div> <div>17 objections be withheld, except as to the</div> <div>18 form of the question and responsiveness</div> <div>19 of the answer, if that's agreeable with</div> <div>20 everyone.</div> <div>21 MR. WAYMIRE: Agreed.</div> <div>22 MR. BUCKLEY: Yes.</div> <div>23 MR. VEAL: All right. So Mr. Smith,</div> <div>24 as I mentioned earlier, my name is</div> <div>25 Antonio Veal. I'm here to ask you</div>

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1 questions about the lawsuit you have
2 filed, okay?
3 Whereupon,
4 EZRA SMITH
5 was called as a witness herein and, having been first duly
6 sworn, was examined and deposed as follows:
7 EXAMINATION
8 BY MR. VEAL:
9 Q. Are you aware that you filed a lawsuit against an
10 employee of NavCare? Her name is Erica Sanchez, and against
11 some deputies from the Rockdale County Jail?
12 A. Yes.
13 Q. And this is our opportunity to ask you questions
14 about what you know about the case, your claims, any damages
15 you -- you say that you have, and anything that you may say
16 in court if this case were to go to trial. Do you understand
17 that?
18 A. Yes.
19 Q. Okay. All right. And I ask this of everyone, and
20 are you under the influence of any drugs or alcohol that may
21 impact your ability to answer any questions today?
22 A. No.
23 Q. Has any medication that you normally take been
24 withheld from you, such that you may not be able to answer
25 any questions today?

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1 A. No.
2 Q. Okay. I know we've gone over some of the
3 preliminary matters before about how to answer and all those
4 things. If there's ever a question you don't understand that
5 I am asking, please let me know so then I can try to rephrase
6 the question or something like that because six, seven, eight
7 months from now, if you answer one of my questions, everybody
8 is going to assume you understood it and take that as the
9 answer. So if you have any questions, I'll try to rephrase
10 and do my best to ask questions as clear as I can. Okay?
11 A. Okay.
12 Q. All right. And just to give you a frame of
13 reference, it's my understanding you were booked into the
14 Rockdale County Jail July 8th of 2024; is that fair? Do you
15 recall the date?
16 A. Not the exact date.
17 Q. Okay. If I were to represent to you that the
18 incident at issue in this case started, we'll say July 8th of
19 2024 and into the early morning hours of July 9th of 2024, do
20 you have any reason to dispute that?
21 A. No.
22 Q. Okay. So do you remember getting booked into the
23 Rockdale County Jail on or about that time period?
24 A. Uh, yes.
25 Q. Okay. Do you remember why you got booked into the

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1 jail?
2 A. Yes.
3 Q. Why?
4 A. For what?
5 Q. For what?
6 A. I don't recall.
7 Q. Okay. Did you know -- Well, I represent to you
8 that it's my understanding that you had a court hearing that
9 day and then you found out after your court hearing that you
10 were going to be taken into custody. Does that sound right
11 to you?
12 A. Somewhat.
13 Q. Okay. What -- You say somewhat. So something
14 about that does not seem right?
15 A. Yeah.
16 Q. What doesn't seem right about what I just said?
17 A. That the court date didn't determine whether I was
18 going to jail or not.
19 Q. Okay. What was the court date about?
20 A. Uh, I think ... I don't recall fully.
21 Q. Okay. What do you recall? Since you don't recall
22 it fully, I assume that means you recall part of it. What
23 part do you recall?
24 A. Uh, something about a -- a bond condition.
25 Q. Okay. So you were on bond, from what you recall?

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1 A. Yes.
2 Q. For what charge were you on bond?
3 A. Hmm. Reckless conduct.
4 Q. Okay. Do you recall the circumstances of that
5 reckless conduct charge?
6 A. Yes.
7 Q. What were -- What were the circumstances?
8 A. You need to elaborate that question. I don't
9 understand.
10 Q. Okay. What happened that got you arrested for
11 reckless conduct?
12 A. Uh ... Um, would you repeat that question?
13 Q. What happened that caused you to get arrested for
14 the charge of reckless conduct?
15 A. Nothing.
16 Q. Okay. But you did get arrested for reckless
17 conduct, yes?
18 A. Yes.
19 Q. And then you were taken to jail, yes?
20 A. Yes.
21 Q. And then you bonded out?
22 A. Yes.
23 Q. And you had a certain bond conditions?
24 A. Yes.
25 Q. And you were in court on or about July 8th for

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1 those bond conditions related to the reckless conduct charge,
2 yes?
3 A. Yes.
4 Q. Okay. What were the bond conditions that you were
5 discussing at the court hearing on July 8th?
6 A. I don't recall.
7 Q. Okay. Did the reckless conduct charge involve a
8 person?
9 A. Um, no.
10 Q. Okay. So if you don't recall the basis of the
11 reckless conduct, how do you know it didn't involve a person?
12 A. Uh, I -- Could you repeat that question?
13 Q. My understanding of your testimony a few minutes
14 ago is that you don't recall why you were arrested. Or no,
15 not that you don't recall. You did not do anything to be
16 arrested for reckless conduct; that was my understanding of
17 your testimony. Do I understand that correctly?
18 A. Yes.
19 MR. SLATER: Object to the form.
20 BY MR. VEAL: (Resuming)
21 Q. Okay. So --
22 THE WITNESS: What does that mean?
23 MR. SLATER: I'm going to object
24 from time to time. Unless I tell you not
25 to answer a question, Ezra, you just take

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1 a minute and let me finish and then Mr.
2 Veal will ask you another question.
3 BY MR. VEAL: (Resuming)
4 Q. Now, is it also your testimony that the reckless
5 conduct charge, whatever the allegations were, did not
6 involve a person?
7 A. Uh, I'm so confused about what you're asking
8 compared to a second ago.
9 Q. Okay. Well, let me -- let me try to back it up.
10 It sounds to me, you don't think you did anything that should
11 have gotten you arrested for reckless conduct.
12 A. Oh, no, I didn't do anything.
13 Q. Right, you didn't.
14 A. Right.
15 Q. I think we agree on that. I think --
16 A. Yes.
17 Q. So I understand that. But you do understand you
18 were arrested for reckless conduct?
19 A. Yes.
20 Q. So somebody made some allegations. Somebody said
21 to somebody, like the police, that you did something wrong.
22 Do you agree with that?
23 A. Yes.
24 Q. Who was the person that said you did something
25 wrong?

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1 A. I don't recall.
2 Q. Okay. Do you recall what that person said you did
3 wrong?
4 A. No.
5 Q. Okay. Why don't you recall what happened a little
6 over a year ago as it related to this reckless conduct
7 charge?
8 A. I mean, I do. I remember what happened, but you're
9 asking do I remember who called. I don't. I don't.
10 Q. Well, my first question was what happened that led
11 you to get arrested for reckless conduct? You said nothing.
12 A. Yes.
13 Q. So but you just told me you know what happened.
14 Tell me what happened then.
15 A. What do you mean? I -- I did nothing to get
16 arrested. That was my answer.
17 Q. Oh, maybe I misunderstood because I thought you
18 just said you remember what happened as it relates to the
19 reckless conduct arrest, yes? Or no?
20 A. Uh, I mean, like, I remember everything that
21 happened that day in my life.
22 Q. But of all those things on that day in your life,
23 you don't know what of those things may have led to you
24 getting arrested for reckless conduct?
25 A. No, because I wasn't -- I didn't, like, no.

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1 Q. Okay. Did you have an attorney represent you in
2 your reckless conduct charge?
3 A. Uh, somewhat. Yes.
4 Q. Okay.
5 A. Yes. They -- Yes. Yeah, she did good. Yeah.
6 Q. Okay. What happened to the reckless conduct
7 charge?
8 A. Oh, it was dismissed.
9 Q. Okay. When was it dismissed?
10 A. Uh, about six months ago.
11 Q. Okay. Did you have to do any pre-trial diversion?
12 Anything that you had to do to allow it to be dismissed?
13 A. No.
14 Q. Okay. Now, you don't remember -- do you remember
15 your bond conditions for the reckless conduct charge?
16 A. Parts of them.
17 Q. Okay. What do you remember?
18 A. Uh, no contact with my ex-wife or current wife, but
19 one I don't talk to anymore.
20 Q. Okay. Were there any mental health --
21 A. And --
22 Q. Oh, I'm sorry. Go ahead.
23 A. And then -- Yeah, no. That's the best -- That's
24 the only one I can recall now.
25 Q. Okay. Were there any mental health conditions?

Page 13

1 A. Sorry?

2 Q. Were there -- Were there any conditions related to

3 any mental health care, mental health treatment, counselors,

4 therapists?

5 A. Uh, any -- Uh, I don't understand what you mean by

6 that.

7 Q. Okay. Did you have to see a therapist or a

8 counselor as a bond condition?

9 A. Yeah.

10 Q. Why?

11 A. 'Cuz -- 'Cuz that's what they told me to do.

12 Q. Okay. Did you have any -- Did you have a

13 therapist or a counselor that you would -- that you were

14 seeing before you got arrested for reckless conduct?

15 A. Could you repeat that again?

16 Q. Were you seeing a therapist or a counselor or

17 anything similar, prior to getting arrested for reckless

18 conduct?

19 A. No.

20 Q. What about since you've been arrested for reckless

21 conduct? Have you been seeing a counselor or therapist?

22 A. Um, that question doesn't make sense to me.

23 Q. Okay. When I say a counselor or a therapist, you

24 understand what I mean when I say a counselor or a therapist,

25 yes?

Page 14

1 A. Yeah.

2 Q. Okay. Have you been talking to a counselor or a

3 therapist since the date you were arrested for reckless

4 conduct on any type of consistent or regular basis?

5 A. Um, I mean, um, I still don't understand your

6 question, but I think yes.

7 Q. Okay. When is the last time you saw a counselor or

8 a therapist?

9 A. Uh, about six months ago.

10 Q. For what reason?

11 A. Uh, for what reason what?

12 Q. Were you seeing a counselor or a therapist six

13 months ago?

14 A. Because I wanted to.

15 Q. Okay. What is his or her name?

16 A. I don't recall.

17 Q. Okay. So you saw this person, this counselor or

18 therapist, whose name you don't recall, six months ago.

19 Prior to this six-month date that you just talked about, had

20 you seen that counselor or therapist before that time frame?

21 A. Hmm. Between what?

22 Q. Okay. Let me do it this way. It's October right

23 now, six months ago would have been April, thereabout.

24 Would you agree with that?

25 A. You're saying --

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1 Q. Okay. Wait --

2 A. -- did I -- did I see her when?

3 Q. Hold on. I'm just -- You said you saw a counselor

4 or a therapist six months ago. Yes?

5 A. I said I saw, um, yes.

6 Q. Okay. So that's about April of 2025; would you

7 agree?

8 A. Yes.

9 Q. Okay. So prior to April of 2025, when was the last

10 time you saw a counselor or a therapist?

11 A. Uh, like two weeks before.

12 Q. Okay. Do you go see a counselor or a therapist on

13 a regular basis? Like every two weeks, every month,

14 something similar?

15 A. Um, no. If I -- I should probably say this. If I

16 say like, that means I don't really understand. So I'm going

17 to have to rephrase the way I'm speaking because I can't give

18 definitive dates on a lot of things, you know. You know, I

19 do use, you know, tools and stuff to help me remember the

20 dates, like calendars and, you know. So just, if I say like,

21 then I just want to say that that means -- And I'm going to

22 try it from here on out not to say that, you know.

23 Q. Okay.

24 A. Because I said like two weeks before, but that was

25 me speculating. So let me not do that again in the future.

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1 I apologize.

2 Q. Okay. So I think the question that you answered

3 when you said like two weeks ago, was me asking you prior to

4 April of 2025, when was the last time you saw a therapist or

5 a counselor?

6 A. Yeah.

7 Q. So you want to change that answer it sounds like.

8 A. I would. I would. I would like to speculate to

9 say that it would have been, I believe, it was about every

10 two weeks, like twice a month from what I recall.

11 Q. All right. So it sounds to me like you see a

12 counselor or a therapist about every two weeks, twice a

13 month --

14 A. Prior.

15 Q. -- is that fair?

16 A. Prior to April, yes.

17 Q. Prior to April? Okay. What made you start seeing

18 a counselor twice a month prior to April of 2025?

19 A. Uh, what made me start?

20 Q. Uh-huh (affirmative).

21 A. 'Cuz I was told to.

22 Q. Okay. Who told you to do that?

23 A. The courts.

24 Q. Okay. So it sounds to me like after your reckless

25 conduct charge was dismissed, you stopped seeing a counselor

Page 17

1 twice a month; is that fair?
2 A. Uh, around that time.
3 Q. Okay. All right. This -- This line of
4 questioning was born out of asking you about the court date
5 you attended prior to you being taken into custody and being
6 in the Rockdale County Jail on or about July 8th, 2024, okay?
7 So do you recall getting arrested on or about July 8th, 2024
8 and being taken to the Rockdale County Jail?
9 A. Do I recall?
10 Q. It happening. The arrest, going into custody, and
11 going to the Rockdale County Jail, do you recall that
12 happening as you sit here today?
13 A. Which one?
14 Q. The one on July 8th, on or about July 8th, 2024.
15 You just talked about you had a court hearing about your
16 reckless conduct bond conditions.
17 A. Uh-huh (affirmative).
18 Q. Then after that, unrelated, you were taken into
19 custody and taken to the Rockdale County Jail. That's what
20 I'm talking about. Do you recall that happening?
21 A. Uh, so we're talking about a different time now?
22 Q. When you say different, as it -- I don't know
23 which --
24 A. As opposed to the first time you were asking me
25 this question?

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1 Q. Well, it depends on what you mean by first time.
2 Because when we first started, I tried to give reference to
3 the arrest that occurred on July 8th, 2024 that then led to
4 the incident that's the basis of your lawsuit. That's what
5 I'm talking about. Okay? Now, are we on the same page now,
6 a little bit?
7 A. Yeah.
8 Q. Okay. Now, do you recall the -- the arrest and
9 what happened on July 8th, 2024?
10 A. I mean, I already told you I don't know exact dates
11 of like --
12 THE WITNESS: Which -- Which date
13 is it? Can you tell me which date he's
14 talking about? 'Cuz he's like --
15 MR. SLATER: He's talking about the
16 date of when you went to the jail and you
17 attempted suicide --
18 THE WITNESS: Okay.
19 MR. SLATER: -- in 2024.
20 THE WITNESS: (Resuming)
21 A. Do I remember getting arrested that day? Yes, I
22 do.
23 Q. Okay. What happened? Tell me what happened, what
24 you remember.
25 A. They arrested me.

Page 19

1 Q. Right. Right. How did they do it? And then what
2 happened?
3 A. They put me in handcuffs. They took me to a cell.
4 Q. Okay. Anything happen between you getting in
5 handcuffs and going to a cell that you can recall? Did you
6 talk to anyone? Did somebody talk to you? Somebody ask you
7 questions? For example.
8 A. They told me I had a warrant.
9 Q. Okay. And by they, I'm assuming you mean the
10 police officers or the deputies, correct?
11 A. Yes.
12 Q. Okay. They tell you you had a warrant. They put
13 you in handcuffs. And then what?
14 A. They told me to stand up.
15 Q. Okay. Then what?
16 A. I stood up.
17 Q. Okay. Next?
18 A. They -- They grabbed me.
19 Q. Okay. Then what happened?
20 A. I believe we walked.
21 Q. To where?
22 A. I remember an elevator.
23 Q. Okay. Then what?
24 A. And then I don't recall exactly.
25 Q. Okay.

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1 A. Um, but I ended up in a cell.
2 Q. Okay. Prior to getting into the cell, do you
3 recall speaking to anyone other than deputies?
4 A. No.
5 Q. You've been to the -- Prior to this particular
6 incident that we're just talking about, you've been to the
7 Rockdale County Jail before, yes?
8 A. Yes.
9 Q. Okay. You're familiar with what a holding cell is
10 at the Rockdale County Jail?
11 A. Yes.
12 Q. Are you familiar with the booking process at the
13 Rockdale County Jail? Well, let me ask a better question.
14 You've been booked into the Rockdale County Jail before this
15 incident that we were just talking about in July, yes?
16 A. Yes.
17 Q. Okay. Now, are you aware that initially you're in
18 a holding cell, yes? With a lot of other individuals. That
19 has happened before, yes?
20 A. Um, that doesn't sound like Rockdale County Jail.
21 Q. Okay. So have you ever been in a holding cell at
22 the Rockdale County Jail before?
23 A. Yes.
24 Q. Okay. Are you -- Have you been in the -- in the
25 holding cell at the Rockdale County Jail before with people

Page 21

1 other than yourself?

2 A. Yes.

3 Q. Okay. And you're aware that you're in a holding

4 cell for a certain amount of time, and then the formal

5 booking process happens when you talk to a deputy, and they

6 get you kind of logged in or booked in so you can then go to

7 the next setting. Are you familiar with that process?

8 MR. SLATER: Object to the form.

9 THE WITNESS: (Resuming)

10 A. (Nonverbal response.)

11 Q. No? No, you don't know?

12 A. I'm not a -- I mean, I'm not a cop.

13 Q. Okay. Well, how about this. The time that you

14 were -- because you said you've been booked into the Rockdale

15 County Jail before. Let's not talk about the July 8th

16 incident. Let's talk about that other times you've been

17 booked into the Rockdale County Jail. What was that process?

18 A. Um, which time?

19 Q. Your collective memory of all of them. Just tell

20 me what you recall how that happened, being booked in.

21 A. Oh, man, I mean, it's always completely different.

22 Q. Okay. Pick one to tell me about.

23 A. Um, uh, uh ... Okay. I remember -- Tell you

24 about one? Uh, I mean, which one? I don't, like -- I

25 don't, like -- Um, which one?

Page 22

1 Q. Which one do you remember?

2 A. Which one do you want me to tell you about?

3 Q. The one you remember.

4 A. I mean, I remember them all.

5 Q. Okay. Let's start from the first one. I mean,

6 it'll take us a little bit longer at the deposition, but --

7 because -- Well, let me ask you this question, since this is

8 taking, or seems to be taking much longer than it should.

9 The booking process that happened on July 8th, 2024, the date

10 that led to the incident that you're suing about, okay?

11 A. Yes.

12 Q. Was that process different than the one you had

13 before?

14 A. Yeah.

15 Q. How?

16 A. Yeah.

17 Q. How was it different?

18 A. Um, how was it different? Uh, I mean, it was

19 different in a lot of ways.

20 Q. Start from the beginning, or start from the top.

21 Wherever you want to start, just tell me how it was

22 different.

23 A. That's not a question. You're saying tell you how

24 it was different. I don't understand. That's not even

25 asking me questions anymore. Now you're just demanding. Can

Page 23

1 we take a break? Can we do a break now? I don't understand.

2 MR. VEAL: I'll let you take a

3 break.

4 MR. SLATER: Let's take a break.

5 MR. BUCKLEY: Let's take a break.

6 MR. WAYMIRE: Off video.

7 (Whereupon, a brief recess was

8 held.)

9 BY MR. VEAL: (Resuming)

10 Q. So I'm going to try to get us back where we were.

11 My question is how, if at all, were your prior bookings or

12 booking situations at the Rockdale County Jail different from

13 the one on July 8th, 2024?

14 A. How are they all different? Or how is just one of

15 them different?

16 Q. Whichever is easiest for you to answer, and I can

17 just ask some follow-up questions if I need to.

18 A. Um, I got -- I got -- I don't remember much from

19 this night, but I remember getting there. I remember being

20 extremely drunk, and I got there and I remember going and

21 immediately getting my clothes stripped, and being put into a

22 jumpsuit, and then I was put in a holding cell. And I

23 remember wrapping a telephone cord around my throat, and

24 immediately, a bunch of cops responded and stopped me, then

25 they took off my jumpsuit and put me in a green suit.

Page 24

1 Q. Okay.

2 A. And they moved me to another cell, and then the

3 next day, they took my finger -- took my fingerprints, and

4 took a picture of me.

5 Q. Okay. All right. So there are a few separate

6 things I want to make sure I understand correctly.

7 Initially, I think the first thing you said was you don't

8 remember much from this night. When you say this night, I

9 assume you're talking about the night of July 8th?

10 A. No.

11 Q. All right. Okay. What night are you talking about

12 when you say this night?

13 A. The one from before.

14 Q. Okay. That's before. Okay. You say you were

15 extremely drunk. Is that from before?

16 A. I thought I said, did I not say 2022?

17 MR. SLATER: I don't remember what

18 you said.

19 THE WITNESS: I thought I said that.

20 My bad if I didn't.

21 BY MR. VEAL: (Resuming)

22 Q. You're good. We're going to figure it out. We'll

23 get there.

24 A. Yeah. I was talking about in 2022, I believe it

25 was.

Page 25

1 Q. Okay. So in 2022, you don't remember much from the
2 night of 2022 when you were arrested?
3 A. Yeah, not all of it.
4 Q. Okay. But in 2022, you would have gone to the jail
5 and you were extremely drunk.
6 A. Yeah.
7 Q. Okay. And then in 2022, they put you into a
8 jumpsuit. You remember that?
9 A. Yeah.
10 Q. And then in 2022, you remember them putting you in
11 a holding cell?
12 A. Yeah.
13 Q. And then in 2022, you remember putting a telephone
14 cord around your neck, around your throat then as well?
15 A. Yup.
16 Q. You say, and you remember the cops rushing in?
17 A. Yes.
18 Q. And then they put you in a green suit?
19 A. Yes.
20 Q. And they put you in another cell?
21 A. Yes.
22 Q. Okay. And this was all in 2022?
23 A. Yes.
24 Q. Okay. And if you recall, that holding cell you're
25 referring to in 2022, were you the only person in the holding

Page 26

1 cell?
2 A. Uh, I think so.
3 Q. Okay. All right. Now I'll get back to some
4 questions about this, but I want to go ahead since we're
5 having a good dialogue. In 2024, July 8th, 2024, the day
6 that's the subject of your lawsuit, the time frame where you
7 attempted to commit suicide, again, it sounds like. Tell me
8 what happened after you are taken from the courtroom or
9 wherever you were, to the Rockdale County Jail.
10 A. Uh, they chained me to a bench.
11 Q. Okay. What else is there -- Do you remember
12 anything else?
13 A. Uh, they asked, uh, I mean, well, like, I remember
14 waiting.
15 Q. Okay. Waiting. What else?
16 A. Uh, there were people around me.
17 Q. Okay.
18 A. And, you know, they were getting processed.
19 Q. Okay.
20 A. I remember, you know, everybody going to a
21 machine (inaudible.)
22 Q. Okay. Anything else?
23 A. Yeah, I remember that they give you -- Oh, no.
24 Did they give me a paper. I remember something about a paper
25 that they write your name, or you would or they would,

Page 27

1 somebody would. A piece of paper that gets your name, I
2 think, and like your Social Security and stuff was written on
3 it, I think.
4 Q. Okay.
5 A. You know, everybody took turns getting on the
6 machine. And then, once you get on the machine, I think they
7 put a -- they took you to another room and they make you get
8 naked.
9 Q. Okay.
10 A. And then they, uh, they, uh, they give you -- they
11 make you squat and cough. And then they give you a jumpsuit.
12 Q. All right.
13 A. And then, yeah, I think we went to the holding
14 cell.
15 Q. Okay. All right. Let me stop you right there.
16 You say you recall being chained to a bench. That would have
17 been before you were placed in a holding cell; is that right?
18 A. Yeah.
19 Q. Okay. That's when you first got to the jail?
20 A. Yeah.
21 Q. Do you recall speaking with anyone while you were
22 chained to the bench?
23 A. Uh, I mean, yeah.
24 Q. Who?
25 A. The cops.

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1 Q. Okay. Anyone else?
2 A. Potentially the people around me.
3 Q. Okay. Like other people who were being arrested?
4 Or somebody different?
5 A. Anybody around.
6 Q. Okay. Did you talk to any medical professionals?
7 Anybody ask you questions about your health at this point?
8 A. I don't -- Not that I recall.
9 Q. Okay. All right. You recall waiting, and you
10 saw -- Right now, you said you watched other people being
11 processed around you. Was that while you were still chained
12 to the bench? Or was that after you were in the holding
13 cell?
14 A. With the people, like, going through the process.
15 Like, we were all chained on the bench.
16 Q. Okay.
17 A. Right. And we went down, you know what I'm saying,
18 they get his information, then his, and then mine, you know
19 what I'm saying. He goes to the machine.
20 Q. Okay.
21 A. And you know, he goes to the machine, then I go to
22 the machine. I mean, he squats and coughs. He squats, and
23 then I squat and cough.
24 Q. Okay. And all of that happens before you go to the
25 holding cell?

Page 29

1 A. Yeah.
2 Q. Okay. When you get to the holding cell, do you
3 recall how many people were in the holding cell with you when
4 you first got into the holding cell?
5 A. Um, roughly.
6 Q. Hmm?
7 A. Roughly.
8 Q. Okay. Roughly how many?
9 A. I want -- I want to say including me would be
10 five.
11 Q. Five?
12 A. That's including me.
13 Q. So four other people?
14 A. Yeah. Yeah, that seems like the right number.
15 Q. Okay. As you sit here today, do you recall how
16 long you were in the holding cell?
17 A. Uh, I remember it being a long time.
18 Q. Okay. Now, while you were waiting for the long
19 time, were other people getting processed and going and
20 getting done, getting through the booking process from what
21 you could tell?
22 A. Yes.
23 Q. Did you ever try to find out what was taking so
24 long?
25 A. Yes.

Page 30

1 Q. How did you do that?
2 A. Uh, well, I attempted to ask.
3 Q. Okay. Do you remember who you tried to ask?
4 A. No.
5 Q. Okay. Would it have been a deputy, medical
6 professional, another inmate?
7 A. Deputy.
8 Q. Okay. You don't remember which deputy though?
9 A. Um, no. I can only speculate.
10 Q. Okay. Do you remember what he or she looked like?
11 A. Again, I only remember asking the question. I
12 couldn't tell you exactly who I had asked it to. But given
13 the circumstance, there would only be one person that I would
14 reach out to, to ask that question, which would be a deputy.
15 So that, you know, that leads me to be fairly positive it was
16 a deputy that I asked. Which deputy, I wouldn't want to -- I
17 wouldn't say because I, you know.
18 Q. You can't remember?
19 A. Yeah. There's plenty of deputies there, so I could
20 just say it was surely one of them.
21 Q. Okay. Do you remember what, how the deputy or the
22 person responded to you when you asked what was taking so
23 long, or tried to find out what was taking so long?
24 A. I mean, I couldn't tell you exactly what they said,
25 but they were all pretty short, you know, with anybody that

Page 31

1 was asking questions, you know. Just kind of, I think they
2 would allude to the fact that they were a little busy in the
3 moment and would get to things.
4 Q. Okay. Do you recall how -- Do you recall how
5 your -- Do you recall how your mood was at the jail during
6 this time when you were waiting to get through the booking
7 process?
8 A. At which point?
9 Q. While you were waiting to get through the booking
10 process.
11 A. While I was waiting to get through the booking, at
12 which point, though?
13 Q. Well, did your mood change?
14 A. Absolutely.
15 Q. How so?
16 A. Well, it started that I was in a fairly positive
17 mood.
18 Q. Okay. So you were in a fairly positive mood when
19 you first arrived in the holding cell; is that fair?
20 A. Yes.
21 Q. Okay. Now that -- did that fairly positive mood
22 change?
23 A. Eventually.
24 Q. Why did your fairly positive mood change?
25 A. Um, um, why? Well, I think there was a lot of

Page 32

1 reasons.
2 Q. Okay. Can you tell me those reasons?
3 A. Uh, I could -- I could try, but I may miss some.
4 Q. Okay. We'll try it. Do your best.
5 A. You know, potentially, hopefully not much to
6 remember, but again, you know, I can only speculate as I
7 don't remember exactly what was going through my mind that
8 day.
9 Q. Okay.
10 A. Surely, it was a combination of exterior factors as
11 well as interior factors, like what's going on in my head.
12 You know, the day started off fairly positive and, I mean,
13 well, it didn't really start off. It was fine in the morning
14 and then I got locked up, but I tried to keep a good mindset.
15 When I got there, I tried to stay positive. I mean, you
16 know, as the day went on, you know, and, you know, I guess
17 the longer I was in the cell and nothing was happening and
18 just, uh, you know, probably stuff going on in my head.
19 Surely, uh, not being, you know, given a actual answer to,
20 like, what was taking the process so long, could have had a
21 part in it. And you know, after a while, my mood did change
22 to be, you know, a less positive mood.
23 Q. Okay. And just, I'm just going to try to recap to
24 see if I have what you've said correctly. So you were in a
25 fairly positive mood when you first got to the holding cell;

Page 33

1 is that fair?

2 A. Yeah.

3 Q. That -- That mood changed to a less positive mood,

4 yes?

5 A. Yes.

6 Q. In part because you did not get answers about why

7 or what was taking so long for you to get through the booking

8 process. That was one thing.

9 A. Potentially, yeah.

10 Q. Well, okay. We'll get to that in a second.

11 A. I said, I can only speculate on how I was feeling

12 exactly, but like I said, I could speculate that surely that

13 could be, you know, part of the reason. There's various

14 things happening in that, you know, moment in the days, you

15 know, in the future, you know.

16 Q. Okay. So what I'm hearing from you is that your

17 mood, you are sure that your mood changed; is that fair?

18 A. Oh, without a doubt.

19 Q. What's that?

20 A. Without a doubt.

21 Q. Okay. So that you're sure about. Now, you're not

22 sure, it doesn't sound like, as to why your mood changed.

23 A. Uh, it was, you know, it was like an addition over

24 time, you know what I mean.

25 Q. Okay. So because I think earlier when I mentioned

Page 34

1 length of time that it was taking for them to get you booked

2 in, you said that might be or that possibly could be what

3 caused or was part of your change in mood. Now my question

4 is, do you know for sure whether that length of time with no

5 explanation caused your mood to change?

6 MR. SLATER: Object to the form.

7 You can answer. You can answer.

8 THE WITNESS: Answer, but what does

9 that mean? What does --

10 MR. SLATER: I objected to his

11 question, but you -- you can still answer

12 his question. You should still answer

13 his question.

14 THE WITNESS: Oh. What was it

15 again?

16 BY MR. VEAL: (Resuming)

17 Q. I was just asking, do you know one way or the

18 other, yes or no, whether the length of time it took you to

19 get booked in with no explanation impacted your mood?

20 A. Yes.

21 Q. Okay. You said there were some potentially

22 internal factors that impacted your mood as well. Yes?

23 A. Yes.

24 Q. What were those internal factors?

25 A. Uh, I don't know exactly what they were.

Page 35

1 Q. Okay.

2 A. I mean, I could speculate.

3 Q. Well, if you -- I don't want you to speculate

4 because that's not really going to mean anything later, but

5 if you know what internal factors impacted your mood so it

6 went from fairly positive to less positive, that's what I

7 would want to know. Now, if you don't know, "I don't know"

8 is a fine answer too.

9 A. Um, yeah, I wouldn't want to -- I don't know. I

10 just wouldn't want to answer that question and possibly be

11 inaccurate. I couldn't tell you exactly what was going

12 through my head at that point in time.

13 Q. Okay. So you don't know what internal factors

14 impacted your mood while you were in the holding cell?

15 A. Um, I could say a hundred percent that it could --

16 it had something to do with my recent breakup.

17 Q. Okay. Any other internal factors that you can

18 think of that would have impacted your mood to go from fairly

19 positive to less positive in the holding cell?

20 A. I mean, yeah, other than that, just I know surely

21 them not acknowledging questions and stuff, because that

22 pretty much always upsets me. So just pretty much being

23 ignored.

24 Q. Okay. Did you ever try to get anyone's attention

25 more specifically or directly so you wouldn't be ignored?

Page 36

1 A. Yes.

2 Q. How did you do that?

3 A. Uh, I pressed the button.

4

5 Q. Okay. What button are you talking about?

6 A. The button in the cell.

7 Q. What does the button in the cell do, if you know?

8 A. Uh, to my knowledge, it's supposed to call the

9 cops.

10 Q. When you pressed the button, did somebody come over

11 to the cell?

12 A. Uh, I think so.

13 Q. Okay. Do you recall who?

14 A. Um ...

15 MR. SLATER: I'm going to object to

16 the form.

17 THE WITNESS: (Resuming)

18 A. Um, I mean, like, I couldn't tell you, like, who

19 came each specific time.

20 Q. Okay. Do you recall how many times you pressed the

21 button to make somebody come over?

22 A. Uh, I remember pressing it, I mean, several

23 different times.

24 Q. Okay. Did someone come over every time?

25 A. No.

Page 37

1 Q. Okay. What, if anything else, did you do to try to
2 get the attention of any of the deputies to get answers to
3 your questions?
4 A. Um, kick the door.
5 Q. Okay. Why did you think kicking the door would
6 work and get their attention?
7 A. Um, because they can't, uh, because they can't turn
8 it off.
9 Q. So when you say they -- so they can't turn off the
10 noise that you're making by kicking the door; is that fair?
11 A. Yes.
12 Q. Okay. So you had a thought that they could either
13 turn off the button or ignore the button; is that fair?
14 A. Yes.
15 Q. But they could not ignore you kicking?
16 A. Yes.
17 Q. Did you have to kick the door -- Let me ask it
18 this way. Well, let me frame it this way, so you understand
19 what I'm asking. So my assumption is, and if I'm assuming
20 incorrectly, let me know, that you pick a time and you say
21 I'm going to start kicking the door. You kicked the door
22 more than once I assume; is that fair?
23 A. Yes.
24 Q. Okay. How many different sets of times did you
25 decide hey, I'm going to kick this door because they can't

Page 38

1 ignore that and I'll get their attention?
2 A. How many different sets of times?
3 Q. Yeah. Or did you just do it once? I'm not sure;
4 I'm just trying to see how many different times you did.
5
6 A. Oh, uh, I mean, I can only for sure say at least
7 one time.
8 Q. Okay. Do you think you did it more than once?
9 A. I don't recall.
10 Q. Okay. Did somebody respond or come over after you
11 started kicking the door?
12 A. Yeah.
13 Q. Do you remember who?
14 A. Yeah.
15 Q. Who?
16 A. I think it was Ms. Tracey.
17 Q. Okay. Do you remember her specifically?
18 A. Um, yeah. I want to say -- Yeah, I want to say
19 yes. Like, I think about it in my head, it couldn't be any
20 other person, so yes.
21 Q. Okay. You said it couldn't be any other person,
22 when you think about it?
23 A. Not -- Not in like, because I can -- the way I
24 could describe it is I remember like, you know what I'm
25 saying, I remember the face being familiar when the person

Page 39

1 came, you know what I mean?
2 Q. Okay. So --
3 A. And I know that she's familiar and the other people
4 weren't as familiar. I remember it being without a doubt a
5 woman.
6 Q. Uh-huh (affirmative).
7 A. I know that for a fact.
8 Q. Black woman or white woman?
9 A. It was -- There was no white woman.
10 Q. Okay.
11 A. There was no white woman, so just --
12 Q. Black woman or Hispanic woman?
13 A. Yeah, just ...
14 Q. Well, no, I'm just trying to -- No, I'm not trying
15 to be funny; I'm just -- Are you going to say -- Were there
16 no Hispanic women there either? And if there wasn't, I just
17 want to --
18 A. No Hispanic women, either.
19 Q. Okay. All right. So it was a black woman. I just
20 want to make sure. I'm not being funny. I just want to
21 cover all the bases.
22 All right. Was it -- Okay. That's fine. You
23 said Deputy Tracey was familiar to you.
24 A. Yes.
25 Q. How was she familiar to you? What do you mean by

Page 40

1 that?
2 A. I've seen -- I've seen her in past visits to the
3 jail.
4 Q. Okay. Have you talked to her in past visits?
5 A. Um, I believe I have.
6 Q. Okay. So you recognized her; is that fair?
7 A. Yes.
8 Q. Do you have any reason to believe that she
9 recognized you at all?
10 A. Yes.
11 Q. What gives you that feeling that she recognized
12 you?
13 A. I had just been there recently.
14 Q. Okay. Do you think you saw her during that recent
15 time period you were at the jail?
16 A. Yes.
17 Q. Okay. So prior to this July 8th, 9th time frame,
18 you -- am I understanding you correctly in that you
19 communicated with Deputy Tracey before?
20 A. Yes, I believe so.
21 Q. Okay. Do you have any recollection about the
22 things you and Deputy Tracey would have talked about before
23 the July 8th, 9th time period?
24 A. Unless I'm confusing her with another officer,
25 which like, I don't know if I should even tell -- if I'm

Page 41

1 confusing her with someone else. Should I tell you that or
2 should I just keep that to myself?
3 Q. Well, what I want to know -- Let me -- Let me do
4 this. It sounds like you're remembering a conversation or
5 some communication with a black female deputy at the jail; is
6 that fair?
7 A. Um, yes.
8 Q. Okay. You're just not sure if it's Deputy Tracey
9 or not.
10 A. Yes.
11 Q. Okay. Would this have been during the previous
12 time you were at the jail, just before --
13 A. Yes.
14 Q. -- the July -- What was that communication?
15 A. It was I just got my hair cut.
16 Q. Okay. And you were just talking about that kind of
17 in a general sense?
18 A. She was telling me it looked good.
19 Q. Okay. Now, this July 8th and 9th time frame, do
20 you recall -- Well, let me withdraw that question.
21 For the July 8th and 9th time frame, after you
22 started kicking, your recollection is that Deputy Tracey came
23 over to the cell; is that right?
24 A. Yes.
25 Q. Okay. Do you recall having any communications with

Page 42

1 Deputy Tracey before she came to the cell after you were
2 kicking?
3 A. None that I could a hundred percent verify.
4 Q. Okay. In addition to kicking to get the attention
5 of the deputies, were you yelling to get their attention?
6 A. Uh, potentially.
7 Q. Now, "potentially" is an interesting answer,
8 because when I hear "potentially," that sounds like -- that
9 sounds to me like you're not sure.
10 A. I mean, I could have.
11 Q. Okay. Is that something you would normally do in a
12 jail setting to get someone's attention?
13 A. Absolutely.
14 Q. Okay. So you were pressing the button at some
15 point to get their attention, yes?
16 A. Yes.
17 Q. You likely were yelling to try to get their
18 attention. Fair?
19 A. Potentially.
20 Q. Okay. And then you were kicking the door to get
21 their attention?
22 A. Yes.
23 Q. Okay. Normally, when you're yelling out to get the
24 deputies' attention, what types of things do you say?
25 A. Somebody please help me.

Page 43

1 Q. Okay. Anything else?
2 A. Normally just help.
3 Q. Okay. When you say please help -- I'm sorry.
4 A. Sometimes they turn off the water.
5 Q. Okay.
6 A. So sometimes I'm begging for water, too.
7 Q. Okay. Anything else?
8 A. Normally just help. Please help me. Please, I
9 need water, something along those lines, depending on what
10 they're doing, what person at the time, you know.
11 Q. On July 8th or 9th, July 8th, going into July 9th,
12 potentially, would you have needed help with anything other
13 than finding out what was taking so long?
14 A. I'm sorry?
15 Q. So you said you would call them to say you needed
16 help, please help me, if you're going to yell out --
17 A. If I was yelling, yes.
18 Q. Right. So potentially, because you said
19 potentially, if you were yelling on July 8th, can you recall
20 anything you would have needed help with?
21 A. Uh, uh, I mean, just probably my mental state.
22 Q. Okay. What about your mental state?
23 A. Just how I may be feeling.
24 Q. Okay. Do you remember how you were feeling that
25 night now?

Page 44

1 A. Um, well, at some point I remember it -- I started
2 to feel depressed.
3 Q. Okay. Do you remember when that night you started
4 feeling depressed?
5 A. Um, I remember it was -- I remember it was before I
6 hung myself.
7 Q. Okay. Do you remember how long before you started
8 feeling -- how long before you attempted to hang yourself did
9 you feel -- Let me ask that question. How long before you
10 hanged yourself did you feel depressed?
11 A. Uh, I couldn't tell you exactly how long.
12 Q. Okay.
13 A. It felt like a long time.
14 Q. Okay. Who did you -- When you started feeling
15 depressed, who did you tell?
16 A. Uh, I tried telling the deputies.
17 Q. Okay. How did you try to tell them?
18 A. I mean, I told them I was suicidal.
19 Q. Okay. Who did you tell?
20 A. Who I was -- Who did I tell?
21 Q. Uh-huh (affirmative).
22 A. I mean, I think whoever answered the button. And I
23 know I told Tracey.
24 Q. Okay. Okay. So let me make sure I have it right.
25 Because I know earlier when you came into the holding cell, I

Page 45

1 believe you said you were in a fairly positive mood, right?

2 A. Yeah.

3 Q. That mood changed to a less positive mood.

4 A. Yes.

5 Q. Because of your recent breakup, the length of time

6 it was taking for you to get booked in, and because you were

7 being ignored, right?

8 A. Yeah.

9 Q. And now, your mood went from less positive to

10 depressed at some point. Yes?

11 A. Yes.

12 Q. What caused your mood to go from less positive to

13 depressed?

14 A. Um, I couldn't identify that.

15 Q. Okay. So what I'm understanding, you don't know

16 what caused your mood to go from less positive to depressed,

17 right? Is that right?

18 A. Yeah.

19 Q. Okay. And you also don't know at what point in

20 time you became -- your mood changed from less positive to

21 depressed.

22 A. I mean, I would say actually -- Yeah, I could

23 actually. I would say, to give a better time frame, it was

24 after I was left alone in the holding cell. That was when I

25 got really depressed.

Page 46

1 Q. Okay. But you don't know what time that was? You

2 just know at some point after being the only person remaining

3 in the holding cell, you became depressed?

4 A. Yes.

5 Q. Was it before or after you started kicking the door

6 to get the deputies' attention?

7 A. I got depressed?

8 Q. Yes.

9 A. Oh, it was before.

10 Q. Before you -- So you got depressed, then you

11 kicked the door to get attention, and Deputy Tracey came over

12 at some point, yes?

13 A. Yes.

14 Q. And at that point, by the time all that happened,

15 you were already depressed?

16 A. Yes.

17 Q. Okay. When Deputy Tracey came over, what did you

18 say to her?

19 A. I remember -- What did I say to her? I don't --

20 I mean, I don't remember exact words of what I said to her.

21 Q. Okay. Were you yelling at her?

22 A. No.

23 Q. So were you talking in the same tone you're talking

24 to me right now?

25 A. Uh, that wouldn't really be possible, so no.

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1 Q. So you were talking louder than you're talking now?

2 A. Yeah.

3 Q. But you weren't yelling?

4 A. No. You have to talk through a door.

5 Q. Okay. And you don't remember what you told her?

6 MR. SLATER: Object to the form.

7 THE WITNESS: (Resuming)

8 A. Not exact words.

9 Q. Well, can you -- what do you remember about what

10 you told her?

11 A. Um, I remember basically asking her why was I the

12 only one that hadn't been processed. I remember, you know,

13 telling her I'd been there for a long time. I remember

14 asking if I could make a phone call, you know.

15 Q. Okay. Do you recall how she -- I'm sorry.

16 A. I think that's it.

17 Q. Okay. How did she respond?

18 A. Aggressively.

19 Q. How so? Explain that to me.

20 A. I remember her yelling.

21 Q. Now, was she talking loudly so you could hear her

22 through the door? Or was she yelling?

23 A. Uh, I think she was talking loudly with an

24 aggressive tone.

25 Q. Okay. What did she say? What do you recall about

Page 48

1 what she said if you don't remember exactly what she said?

2 A. Um, I remember her -- I remember her telling me not

3 to kick the door.

4 Q. Okay.

5 A. Um, I don't remember -- I don't remember if it was

6 in this moment or if this was -- if she came back later.

7 But, I mean, it could be this moment 'cuz, you know, we had a

8 lot of back-and-forth confrontation. So I believe -- I

9 believe it was this moment because, again, she was aggravated

10 and we were kind of going back and forth. So I believe when

11 I like started talking to my mom, she said -- she spoke to my

12 mom at some point, and from what I remember, she told me that

13 she knows everything about me and she thinks I'm a piece of

14 shit. And, uh, I remember at some point she, you know, told

15 me that I needed to kill myself. And that I remember her,

16 you know, making a lot of faces and hand motions and stuff at

17 me. There was, like, I remember her doing, like, a thing

18 with her finger where she's, like, like, twirling around her,

19 like, doing this (demonstrating). And she's like, I talked

20 to your mom. She's, like, insinuating that my mom was crazy.

21 And then again proceeded to tell me to kill myself because

22 she knew about me and said I deserved it. And you know, I

23 believe -- I believe at that point was also when she motioned

24 for me to, like, hang myself. And you know, I think she

25 ended up, I ended up telling her that I was suicidal. Like,

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1 I, like, genuinely was, bro, and I needed, like, I needed
2 help. And her response was to just, again, tell me to do it,
3 tell me to hang myself, tell me to fucking kill myself. And
4 that's what I remember from the back and forth between us
5 when she was at the window.
6 **Q. Okay. Now, I need -- I want to back up because you**
7 **said a few minutes -- well, not a few minutes ago, a few**
8 **seconds, some seconds ago, that there was a lot of back and**
9 **forth between you and Deputy Tracey.**
10 A. Yeah.
11 **Q. Okay. Now, just before you made that statement,**
12 **you represented that the only thing you said to her that you**
13 **could recall was that you asked why you had not been**
14 **processed, could you make a phone call, and that you were --**
15 **why were you there for so long. Now are you saying -- do you**
16 **now recall more back and forth between you and Deputy Tracey?**
17 A. No. The previous questions you asked me to say
18 something that I was positive I at least said, and then the
19 further question you did ask me to speculate. So I
20 speculated on how the conversation could, like, most likely
21 went, when prior I just told you things I know for a fact
22 that I said.
23 **Q. I gotcha. I gotcha.**
24 A. You know what I'm saying? I don't want to tell you
25 for a fact back and forth what she said to me and what I said

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1 with her when, you know what I'm saying? Obviously, I'm not
2 a recorder, I couldn't accurately tell you what exact words
3 were said back and forth between us.
4 **Q. Okay.**
5 A. But when you asked me to speculate, I could give
6 you the gist of what happened and, you know, I could
7 substitute words for other words because that's, you know,
8 the easiest way in my mind to remember, you know what I mean?
9 **Q. Okay.**
10 A. You know what I'm saying? Where I remember her
11 saying be quiet, she might have told me to shut up or vice
12 versa, you know what I mean? So that's why, you know, the
13 other things I could tell you I would for sure say.
14 **Q. Okay. So the questions that you told me, you know**
15 **those, you asked her those questions for sure? You remember**
16 **that for sure?**
17 A. For sure.
18 **Q. Okay. Now, all the back and forth, you don't**
19 **remember the back and forth?**
20 A. I remember the back and forth.
21 **Q. Okay.**
22 A. I don't remember exact, exact like back and forth
23 that were said. I can tell you exact moments I remember from
24 our back and forth where when she said that my mom was crazy
25 and did the thing with her hand, because this is me speaking

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1 on things that she did. I remember on the back and forth
2 where she told me that she knows about me and I deserve to --
3 I remember, I deserve to die. I remember where she told me
4 that she'd been on the phone with my mom, and she talks to my
5 mom. Like, those are things that I remember.
6 **Q. Okay. But you don't remember what you said to her?**
7 A. I mean, in response, I mean, again, I could
8 speculate when she said that she talked to my mom or
9 something. I could probably be like, well, what did she say,
10 blah, blah, blah, what that -- what's going on? And then her
11 response was something like telling me my mom was crazy.
12 Like, I would, like, I mean, I couldn't tell you exactly what
13 was said.
14 **Q. Okay. So what I'm hearing -- and if I have it**
15 **wrong, let me know. You don't remember everything that was**
16 **said between you and Deputy Tracey. You have a, it seems**
17 **like you have a fairly good memory of her calling you a piece**
18 **of shit, right?**
19 A. I mean, man, I hate, like --
20 **Q. If you don't -- Now, if you don't remember her**
21 **saying that, just tell me now and I'll make -- I'll just**
22 **scratch it off the list so I can -- we can correct it now.**
23 **Do you recall Deputy Tracey calling you a piece of shit? Is**
24 **that something you can swear to?**
25 A. I don't like this because I don't know if that was

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1 the exact word she used. Yeah, I want to say yes. I want to
2 say yes, but she could have used any other word, but I want
3 to say yes. Like, as far as my brain remembers, yes.
4 **Q. Okay. So you're sure about that, it sounds like?**
5 A. Yup. In my head, that's yes.
6 **Q. Okay. And it seems like you're sure that she said**
7 **she spoke to your mom.**
8 A. Yes.
9 **Q. And that she said -- Or well, that she did a hand**
10 **gesture insinuating that your mother was crazy?**
11 A. Yes.
12 **Q. You remember that specifically?**
13 A. Yes.
14 **Q. You remember her saying that you need to kill**
15 **yourself?**
16 A. Yes.
17 **Q. Okay. And you remember her saying -- Go ahead.**
18 **Sorry.**
19 A. I also remember her saying, because I talk like, I
20 also remember her saying, I remember, I do, like, as we talk
21 about it, some of the back and forth comes back to me from
22 what I remember saying something about I've been here for
23 this many hours. I don't remember what number I used at the
24 time. You know, I know it was in the double digits of
25 whatever number I used, saying how many hours I've been

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1 there, and she told me that I'd be there for that many more
 2 hours. And it was just like, I remember that part, because I
 3 remember that part affecting me.
 4 **Q. Okay. Okay. You have a specific recollection of**
 5 **Deputy Tracey telling you that you should kill yourself, you**
 6 **deserve it, or something similar to that?**
 7 A. Yes.
 8 **Q. And it sounds like what you just said is that you**
 9 **remember her, you have a specific recollection of her telling**
 10 **you that you'll be here a number of more hours. You don't**
 11 **know the exact number, but a number of more hours.**
 12 A. Yes. And it was, I don't remember what she told
 13 me, like, exactly I was doing that would make it that way,
 14 but I do remember her kind of making that, like, a threat,
 15 like, and I remember it affecting me some.
 16 **Q. Now, I'm going to go back through all the things**
 17 **that you have a specific recollection of. You say you have a**
 18 **specific recollection of her calling you a piece of shit.**
 19 **How did you respond to that?**
 20 A. I don't know.
 21 **Q. Okay. You have a specific recollection of her**
 22 **insinuating that your mother was crazy. How did you respond**
 23 **to that?**
 24 A. Um, probably started to, you know, get sad.
 25 **Q. Okay. Do you remember getting sad in response to**

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1 that?
 2 A. I remember feeling hurt.
 3 **Q. In response to that statement?**
 4 A. Yeah.
 5 **Q. Okay. Did you say anything to Deputy Tracey?**
 6 A. (Inaudible.) Yeah.
 7 **Q. What did you say to her in response to that?**
 8 A. I don't recall exactly.
 9 **Q. Okay. When she told you to kill yourself, how did**
 10 **you respond to that?**
 11 A. I probably told her I was going to.
 12 **Q. Do you remember saying that?**
 13 A. At some points, yes.
 14 **Q. When?**
 15 A. When I was being told to kill myself.
 16 **Q. Okay. How many times did she tell you that?**
 17 A. In that moment?
 18 **Q. Well, which moments are you talking about? Because**
 19 **my understanding from your testimony is that in response to**
 20 **her saying that you should kill yourself, that you said you**
 21 **were going to do it.**
 22 A. Yeah.
 23 **Q. So I'm trying to figure out how many times did that**
 24 **exchange happen?**
 25 A. Like right there, while she's still in front of the

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1 window?
 2 **Q. Well, sure. For present purposes, yes, while she's**
 3 **still there at the window.**
 4 A. Um, we probably went back and forth and she
 5 probably, like, said it and then, like, doubled down on it
 6 like three or four times in that moment with, again,
 7 expressions and, you know what I'm saying, gestures and
 8 whatnot, and then again words.
 9 **Q. Okay. And so she would say you should kill**
 10 **yourself. You respond, I'm going to do it. That's what**
 11 **you're saying?**
 12 A. Something along those lines, yeah.
 13 **Q. Well, hold on.**
 14 A. Yes.
 15 **Q. Yes? Okay.**
 16 A. I wouldn't say like every single time my response
 17 was that, but it would be that and different variations of
 18 it.
 19 **Q. Okay. How long did that back and forth go on? How**
 20 **long did that back and forth at the window go along?**
 21 A. At least a minute.
 22 **Q. At least a minute?**
 23 A. Believe so.
 24 **Q. So at that time, you're at the -- she's at the**
 25 **window. After you kick the door to get her -- somebody to**

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1 come, she comes. You ask her the few questions that you can
 2 definitely remember, and then there's a lot of back and forth
 3 you don't remember. And she calls you a piece of shit, tells
 4 you to kill yourself, insinuates your mother's crazy, talks
 5 about calling your mother, and you respond back and forth to
 6 her and it's your testimony that you think all that happened
 7 within a minute?
 8 A. Yeah.
 9 **MR. SLATER:** Object to the form.
 10 You can answer.
 11 **BY MR. VEAL:** (Resuming)
 12 **Q. How long after, if you recall, this exchange at the**
 13 **window, how long after this did you attempt to commit**
 14 **suicide?**
 15 **MR. SLATER:** Sorry, I didn't hear
 16 that.
 17 **MR. VEAL:** I'm sorry.
 18 **BY MR. VEAL:** (Resuming)
 19 **Q. How long after this exchange at the window that**
 20 **we've just been talking about, this exchange, this**
 21 **minute-long exchange, how long after that did you then**
 22 **attempt to commit suicide? Sorry.**
 23 A. Uh, I don't remember.
 24 **Q. You talked about other exchanges occurring between**
 25 **you and Deputy Tracey, okay? And one way that you**

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1 distinguished between the exchanges was that one happened at
2 the window.
3 A. Yes.
4 Q. Did you have exchanges with her where she was not
5 at the window?
6 A. Yes.
7 Q. How? Tell me how that happened.
8 A. Uh, so I pressed the button and -- So one of the
9 times that I can tell you for sure I remember what happened,
10 that without a doubt I know it was Tracey, was I pressed the
11 button and someone else answered the button that wasn't
12 Tracey. So then I think Tracey answered the first time, but
13 I don't remember what happened there. But Tracey, someone,
14 uh, so someone answered, it was the other lady that was
15 there. She answered the button, she asked me what was going
16 on. I told her I was suicidal, I wanted to kill myself, you
17 know what I'm saying, that they needed to do something
18 because I was genuinely suicidal and wanted to die. And, uh,
19 Tracey was at the desk and while at the desk she yelled back,
20 you know, to the button, tell him to kill himself, tell him
21 to fucking kill himself and hang up the button. And so the
22 lady does as she instructs and hangs up the button and then
23 walks away. And I do remember seeing Tracey look back from
24 her computer and saying tell him to fucking kill himself,
25 tell him to hang himself and hang up the button, you know

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1 what I'm saying. Or no, no, no, I don't think she said tell
2 him to kill himself. I think she yelled then fucking kill
3 yourself or something like that. It was something about
4 kill -- it was either tell him to kill himself or it was
5 saying then fucking kill yourself. Regardless, she yelled it
6 back to me at the button, you know what I'm saying, so I
7 could hear, you know, from in my cell through the button
8 speaker and then she instructed the woman to hang it up,
9 which she did.
10 Q. Did that exchange you just talked about that, did
11 that happen before or after you kicked the door to --
12 A. It was after.
13 Q. After? Okay. So what I understand from you, you
14 kicked the door, Deputy Tracey comes over, there's the
15 exchange, the minute long exchange we just talked about where
16 you said, at least in part, want to kill myself, she says do
17 it, you say okay, basically, you know, paraphrasing. Then
18 after that, you press the button to tell the deputies again
19 that you're going to kill yourself.
20 A. Yes.
21 Q. Yes?
22 A. Yes.
23 Q. And then Deputy Tracey says well, do it, and hangs
24 up the button. Or somebody hangs up the button or hangs up
25 whatever that intercom is.

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1 A. Well, someone else answers and asks me what's my
2 emergency. And then I tell them that I'm feeling suicidal
3 and I want to kill myself, and then that's when Tracey from
4 her desk yells back to the person, you know, yelling to me,
5 I'd imagine to, you know, to kill yourself and then tells her
6 to hang up the button.
7 Q. Okay. All right. So that, after that happens,
8 then what do you remember?
9 A. Uh, trying to press the button again.
10 Q. Okay. And what happened after you pressed the
11 button again?
12 A. Either, uh, I mean, at that point I was either
13 answered and told, you know, I'm not getting any, you know,
14 help or -- or I was just ignored.
15 Q. Do you have a specific recollection of being
16 ignored?
17 A. Yes.
18 Q. Okay. So do you have a -- So if you were being
19 ignored, that means nobody responded to you?
20 A. Yeah.
21 Q. Okay. So nobody told you to commit suicide again,
22 they just ignored you; is that your testimony?
23 A. Uh, from what I recall.
24 Q. Okay. So after you press the button and you're
25 ignored, then what do you recall?

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1 A. Uh, I remember beating my head on the window.
2 Q. Okay. Why were you doing that?
3 A. I'm sorry?
4 Q. Why did you do that?
5 A. Uh, I guess I got mental problems.
6 Q. Okay. So as you sit here today, you don't recall
7 why you started beating your head up against the window?
8 A. (Nonverbal response.)
9 Q. Was that a no? Well, we gotta get an audible
10 answer.
11 A. Oh, I don't -- I -- I, you know, couldn't tell you.
12 Q. Okay. After you beat your head against the window,
13 what, did somebody come over?
14 A. Not that I recall.
15 Q. So what made you stop doing that?
16 A. Um, I think I might have just had a different idea.
17 Q. A different -- Wait. Okay. Let me make sure I
18 understand. So my understanding from your testimony is that
19 you're beating your head on the window, but you don't know
20 why, right?
21 A. (Nonverbal response.)
22 Q. Nobody responded to you when you did that, so you
23 stopped doing it, yes?
24 A. Uh, um, yeah, I guess. Yeah.
25 Q. Okay. And you just said you had a different idea.

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1 A. I -- I assume.
2 Q. Well, I don't want you to assume. I'm trying to --
3 A. Okay.
4 Q. -- I mean, you can assume if you want, if that's
5 your answer. I don't think it's going to mean much later,
6 but I'm just trying to make sure I understand. You don't
7 know if you had a different -- you don't know why you stopped
8 beating your head against the window is what I'm hearing from
9 you.
10 A. I guess. I mean, I -- They didn't tell me to beat
11 my head on the window.
12 Q. They who?
13 A. The cops.
14 Q. Okay. But you did -- you did that on your own?
15 A. Yeah.
16 Q. You don't know why you did it, right?
17 A. Yeah.
18 Q. Okay. And then you just stopped doing it.
19 A. Yeah.
20 Q. Okay. And while you were beating your head on the
21 window, nobody came over and responded, right?
22 A. Right.
23 Q. Okay. So after you stopped beating your head on
24 the window, what happened?
25 A. Uh, I think I beat my head on the wall.

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1 Q. That's inside the cell?
2 A. Yeah.
3 Q. Okay. Why did you do that?
4 A. I don't know.
5 Q. Were you yelling or saying anything while you were
6 doing it?
7 A. I don't remember.
8 Q. Okay. I'm assuming you stopped doing it.
9 A. (Nonverbal affirmative response.)
10 Q. What made you stop?
11 A. I don't know.
12 Q. Okay. So after you beat your head against the wall
13 and you stopped -- Well, let me withdraw that question.
14 Did any deputy respond to you beating your head
15 against the wall?
16 A. No.
17 Q. Okay. After you stopped beating your head against
18 the wall, what happened?
19 A. I got the phone.
20 Q. Okay.
21 A. And I wrapped it around my throat.
22 Q. Okay.
23 A. And I hung myself.
24 Q. Okay. Why did you do that?
25 A. Because that's what Tracey told me to do.

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1 Q. Okay. So prior to her telling you to do that, you
2 did not want to do it?
3 A. I was considering it.
4 Q. So maybe, it sounds like. It was possible?
5 A. I mean, not -- not considering it, like, you know,
6 I had thought about it, like, in the past, you know what I
7 mean? Like prior to Tracey, yes, I've thought about hanging
8 myself, because in 2022, I did it.
9 Q. I got you. Okay. Well, let me ask a better
10 question, because that likely was a poor question on my part.
11 What it sounds like you're saying to me is that prior, at
12 least in your opinion, prior to Deputy Tracey telling you to
13 do it, you weren't necessarily considering hanging yourself,
14 but you were -- it was just a thought that was there, because
15 it had been there before, years ago.
16 A. Yeah. It's always there.
17 Q. Okay. What happened after you put the phone cord
18 around your neck?
19 A. Uh, like, what happened after I it on my neck?
20 Q. Uh-huh (affirmative). Just what you recall after
21 that. What do you -- What's the next thing you recall?
22 A. Uh, nothing.
23 Q. Okay.
24 A. Like, actually nothing, you know.
25 Q. Right. I think, yeah, I get that. So I'm just

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1 trying to wonder, the next -- the next recall, the next
2 memory you have after putting a cord around your neck is
3 what? Was it the next day? Was it several hours ago -- or
4 several hours later. What do you remember?
5 A. Uh, I remember -- The first thing that I remember,
6 I remember -- I remember thinking to myself.
7 Q. What do you -- What do you remember thinking to
8 yourself?
9 A. Uh, I think that I must have hit my head pretty
10 hard.
11 Q. Why did you think that?
12 A. Because that was the last thing I remembered.
13 Q. Oh, so you thought maybe you went out because you
14 hit your head on the wall?
15 A. Yeah.
16 Q. Okay. Did you not remember having -- at least that
17 first thought you had, did you not remember that you put the
18 phone cord around your neck?
19 A. (Nonverbal negative response.)
20 Q. When you had that thought you just had about, you
21 must have hit your head pretty hard, where were you when you
22 had that thought? Do you recall?
23 A. I know where I was now. I didn't know where I was
24 then.
25 Q. Okay. What -- What do you remember after that?

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1 A. Uh, I remember thinking that I couldn't see.
2 **Q. You couldn't see? In real time you couldn't see,**
3 **meaning your eyes were open but you couldn't see anything**
4 **that you couldn't see from before?**
5 A. Yeah. And I remember -- I remember I could hear,
6 it sounded like -- it sounded like snoring. Like I remember
7 not being able to see and I heard snoring, and I remember I
8 could see the ceiling.
9 **Q. The ceiling?**
10 A. Yeah.
11 **Q. Would that be the ceiling of what? Was it a jail?**
12 **Was it a hospital?**
13 A. I mean, it was a jail but I didn't know then. I
14 didn't know where I was.
15 **Q. Okay.**
16 A. And then I remember -- I remember thinking that I
17 should move, but I couldn't move. I remember thinking that
18 everybody was scared because everybody was standing around me
19 looking at me.
20 **Q. When you say everybody's around, deputies?**
21 A. At me. I don't know who it was.
22 **Q. Okay.**
23 A. And then I remember, like, finally, like, trying to
24 move and I was finally able to move. And then I remember
25 everybody, like -- I remember everybody trying to stop me

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1 from moving. So then I had to try even harder to move and
2 then they finally let me, like, I think they let me roll
3 over.
4 **Q. Okay.**
5 A. And then I remember, uh, being put on a gurney, and
6 then I remember trying to remember what happened exactly. I
7 remember trying to think, and I remember, like, I remember
8 her, like I remember her telling me to kill myself. And I
9 remembered wanting to just say something about it, but I
10 remember not being able to speak, and like, every time I
11 tried to talk, like, I'd forget how to talk, like, after,
12 like, a word or two. And then, like, eventually I found out,
13 like, you know, all the words I needed to just ask them.
14 I asked them -- well, I think at first I asked them, you
15 know, like, who she was or, like, why she said that to me.
16 And they didn't know. I don't think they knew exactly who I
17 was talking about or either they did. And I kept trying to
18 get, like, who was she, who was that lady that was saying and
19 telling me to kill myself. And I remember the deputy told me
20 that he couldn't tell me that, you know, just so, like, I
21 guess, like, he just couldn't tell me her name and he
22 couldn't get the information on me and stuff.
23 **Q. And all this is happening, you're still at the jail**
24 **at this point?**
25 A. No. I was in the ambulance at this point.

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1 **Q. At which point of what you just said were you in**
2 **the ambulance?**
3 A. Where I -- So I couldn't talk until I was in the
4 ambulance. And we were probably like halfway to the
5 hospital.
6 **Q. So I just want to make sure I have it correct.**
7 **After the exchange with Deputy Tracey at the window, you**
8 **tried to call on the intercom again. Another deputy answered**
9 **it. Yes?**
10 A. (Inaudible affirmative response.)
11 **Q. And then you heard Deputy Tracey tell that other**
12 **deputy to hang up, and then that deputy hung up. Yes?**
13 A. Yes.
14 **Q. And then you recall Deputy Tracey yelling at you to**
15 **kill yourself, or go ahead and do it, or something similar to**
16 **that.**
17 A. She yelled that before the lady hung up the button.
18 **Q. Okay. All right.**
19 A. Then told the lady to hang up.
20 **Q. Okay. All right. So I had that backward. Thank**
21 **you. And after that happened, you started beating your head**
22 **on the window.**
23 A. Yeah.
24 **Q. Nobody responded to you.**
25 A. Yeah.

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1 **Q. And then you stopped.**
2 A. Yeah.
3 **Q. You started beating your head against the wall.**
4 A. Yeah.
5 **Q. Nobody responded to that either.**
6 A. Yeah.
7 **Q. Then you stopped. Yes?**
8 A. Yeah.
9 **Q. And then you put the phone cord around your neck.**
10 A. Yeah.
11 **Q. And you don't remember you do that. You don't**
12 **remember anything. But you wake up still in the jail, but --**
13 A. No, no, no, no, no.
14 **Q. Okay.**
15 A. I remember putting the cord around my neck.
16 **Q. Right.**
17 A. And then I remember, like, nothing. You know what
18 I mean? Like, I don't know how to describe it, like, feeling
19 like you're dead or what, like, you know.
20 **Q. Okay.**
21 A. I remember feeling nothing, like, I didn't know.
22 Like, I didn't know what was anything anymore, but I remember
23 that. I remember that moment, and I remember that feeling.
24 But it was nothing, you know what I mean, so I do remember
25 that. But there was nothing, you know what I mean? You

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1 know, you can't really describe nothing.
2 Q. Right. So you remember nothing, the nothingness
3 that happened after you put the cord around your neck.
4 A. Yes.
5 Q. Okay. And then you remember -- the next -- The
6 first thing you remember after the nothingness, so to speak,
7 is I believe you said seeing the ceiling, still at the jail.
8 Yes?
9 A. Well, I didn't know I was at the jail at the time.
10 Q. Well, I know. Well, you know now you were at the
11 jail.
12 A. That was the first thing I saw, yeah.
13 Q. The ceiling. And you know now that it was jail,
14 even though you didn't know that then.
15 A. Yeah, in that exact moment.
16 Q. Right. That's fine. That's fine. And in that
17 moment, you're trying to move. You couldn't, at some point,
18 correct?
19 A. Yes.
20 Q. There are a bunch of people around you.
21 A. Yes.
22 Q. In your mind, what you understand is that they seem
23 scared.
24 A. Yes.
25 Q. Okay. You eventually are able to move.

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1 A. Yes.
2 Q. And then they tell you to stop.
3 A. No. They didn't speak to me.
4 Q. Okay. I thought you said they tried to get you to
5 stop moving.
6 A. I think -- I thought they were holding me. Maybe
7 they weren't holding me. Maybe I just felt like I was being
8 held. I don't know.
9 Q. Okay.
10 A. As I recalled it, people were holding me down, but
11 I mean, maybe nobody was holding me. I don't know.
12 Q. Okay. Do you remember anybody giving you CPR?
13 Because that could have been somebody pressing on you --
14 A. Do I remember it happening? No.
15 Q. Okay. But you are aware that CPR was given, or
16 administered?
17 A. Yeah.
18 Q. At some point you're put on a gurney. Yes?
19 A. Yeah.
20 Q. Taken to an ambulance.
21 A. Yeah.
22 Q. And on the ambulance you start talking; you're able
23 to talk at that point from what you can recall.
24 A. Yes.
25 Q. Now, how long were you in the hospital? Do you

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1 know?
2 A. I think a week.
3 Q. Okay. That's fine. I mean, it doesn't really
4 matter. You know you're there longer than a day. You didn't
5 just go there and come back?
6 A. Yeah.
7 Q. Okay. After leaving the jail, after attempting to
8 commit suicide and going to the hospital, have you tried to
9 commit suicide again?
10 A. Yeah.
11 Q. When?
12 A. Uh, um, I think it was like a couple months ago.
13 It was, like, I think it was June or July.
14 Q. Of this year?
15 A. Yes.
16 Q. Do you know what led to that attempt?
17 A. Uh, um, yeah. It was like a argument.
18 Q. An argument with whom?
19 A. My girlfriend.
20 Q. Okay. So other than -- You know, not meaning to
21 be flippant about it, other than that suicide attempt in June
22 or July, was there any other time you tried to commit suicide
23 since you were -- you got out of jail on July 9th?
24 A. No.
25 MR. SLATER: I'm going to need a

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1 break soon.
2 MR. VEAL: Yeah, we can take a break
3 now. That's fine.
4 MR. WAYMIRE: Off video.
5 (Whereupon, a brief recess was
6 held.)
7 MR. WAYMIRE: Back on video at 2:17.
8 BY MR. VEAL: (Resuming)
9 Q. All right. Is there anything that you could do, or
10 that you were able to do, before attempting to commit suicide
11 in July of 2024 that you can no longer do now?
12 A. Um, yeah.
13 Q. What?
14 A. Uh, I find it hard to, like, talk to people and
15 stuff.
16 Q. Why do you find it hard to talk to people?
17 A. It's hard to trust people.
18 Q. Okay. Do you -- Do you believe you not being able
19 to trust people is related to the suicide attempt back in
20 July of 2024?
21 A. Yes.
22 Q. How so?
23 A. Um, well, it showed me that, you know, people will
24 use stuff against you. And like, you know, even when they
25 act like they care, they really don't. So it just kinda has

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1 me where, you know, I'm scared to make any relationships or
 2 tell anybody about myself, or even really leave the house
 3 anymore.
 4 **Q. Okay. Are you -- Who are you referring to when**
 5 **you say people can use things against you. Are you**
 6 **talking -- Who are you talking about?**
 7 A. Everyone. Just, you know, I'm referring to just
 8 the way she did, you know. Like I said, I believed at one
 9 point me and her were cool. From what I remembered, she
 10 talked to me about me getting my hair cut, said she liked it.
 11 And then I remember her telling me she spoke to my mom, you
 12 know, apparently she had spoken to my mom for long enough to
 13 where my mom told her about me. And she expressed to me that
 14 she knew about me from what my mom told her. And then her
 15 response was to tell me to kill myself. So it just, you
 16 know, it kinda showed me it was safer to put up walls and
 17 stuff.
 18 **Q. Okay. So that distrust comes, it sounds like it**
 19 **comes from that interaction or experience with Deputy Tracey?**
 20 A. Yes.
 21 **Q. Is there anything else that you think you could do**
 22 **before the suicide attempt that you can no longer do now?**
 23 A. Uh, I mean, I feel like I can't really, like,
 24 communicate as well.
 25 **Q. Okay. Is that based on something that happened as**

Page 74

1 it relates to the suicide? Or more so you just don't want to
 2 communicate with people?
 3 A. Um, uh, I find it, like, harder to talk and put
 4 together sentences, you know. I feel like it affected, you
 5 know, my brain.
 6 **Q. Have you talked to a medical professional to see**
 7 **if -- if the attempted suicide impacted your brain, or**
 8 **something similar?**
 9 A. I can't afford to see professionals like that.
 10 **Q. Okay. Did you tell your mother why you attempted**
 11 **to commit suicide?**
 12 A. Um, yeah.
 13 **Q. What did you tell her?**
 14 A. Uh, because the lady told me to.
 15 **Q. Because before she, according to you, before she**
 16 **said it, it was just a thing that would -- that would kind of**
 17 **float around, always with you. The potential for or**
 18 **possibility for doing that, right?**
 19 A. Yes.
 20 **Q. Do you take any medication?**
 21 A. No.
 22 **Q. Are you prescribed any medication that you don't**
 23 **take?**
 24 A. No.
 25 **Q. Were you on any medication before you attempted to**

Page 75

1 **commit suicide?**
 2 A. No.
 3 **Q. Do you know Erica Sanchez?**
 4 A. Uh, not personally.
 5 **Q. Have you ever interacted with Erica Sanchez?**
 6 A. Uh, not that I can recall.
 7 **Q. What caused you to try to commit suicide in 2022?**
 8 **MR. SLATER:** I'm sorry. I couldn't
 9 hear you.
 10 **BY MR. VEAL:** (Resuming)
 11 **Q. What caused you to try to commit suicide in 2022?**
 12 A. Uh, I was extremely intoxicated. I couldn't give
 13 you --
 14 **Q. Okay. So --**
 15 A. I couldn't even tell you what was going through my
 16 head in that moment.
 17 **Q. Okay. I think the attempt in 2025 was related to a**
 18 **situation with your girlfriend?**
 19 A. Yes.
 20 **Q. Other than those three, the three occasions we**
 21 **talked about already, have there been any other suicide**
 22 **attempts?**
 23 A. Yes.
 24 **Q. When?**
 25 A. Uh, when I was in a group home.

Page 76

1 **Q. When were you in a group home? Do you remember**
 2 **what year that was?**
 3 A. Uh, not the exact year.
 4 **Q. Okay. What's your estimate of what year that was?**
 5 A. Uh, I think it might have been 2017.
 6 **Q. What made you try to commit suicide in 2017? If**
 7 **that was -- I mean, while you were in the group home. Let me**
 8 **ask it that way.**
 9 A. I felt like I was being abused.
 10 **Q. By whom?**
 11 A. The group home manager.
 12 **Q. How did you attempt to commit suicide?**
 13 A. I used string off a shoe.
 14 **Q. Did you have to go to the hospital?**
 15 A. No.
 16 **Q. Did somebody come in and stop it before it**
 17 **happened?**
 18 A. Uh, yes.
 19 **Q. Do you know who?**
 20 A. I mean, not their name.
 21 **Q. Okay. Was it other folks in the group home,**
 22 **somebody in a group home?**
 23 A. It was staff.
 24 **Q. Staff. Did you tell anyone about that, any family**
 25 **members?**

Page 77

1 A. Um, no.
2 Q. In 2022 when you attempted to commit suicide, was
3 that at the Rockdale County Jail?
4 A. 2022?
5 Q. Yes.
6 A. Yes.
7 Q. And they -- How did you try to commit suicide in
8 Rockdale in 2022.
9 A. With the telephone.
10 Q. Okay. Did the deputies or somebody stop you before
11 you were able to do it?
12 A. Yes.
13 Q. In -- In July of 2024, do you recall either Deputy
14 Tracey or one of the other deputies coming into the holding
15 cell, talking to you and the other inmates about you having
16 threatened to commit, or saying that you wanted to commit
17 suicide?
18 A. Hmm. No, I don't recall that exactly.
19 Q. Okay. Do you recall telling any of the other
20 inmates that you wanted to commit suicide?
21 A. Um, I mean, it was kind of like, to me, like, I was
22 saying it was a joke. To me, it was kind of a joke. But I
23 mean, yeah, I joked about it.
24 Q. Okay. So you joked about it with the other inmates
25 that day?

Page 78

1 A. Yeah.
2 Q. Okay. And somebody -- You don't -- But you don't
3 recall those inmates telling the deputy that you were saying
4 that?
5 A. Um, I don't recall a deputy walking in and talking
6 with everybody.
7 Q. Well, let me take that part out. Do you recall the
8 inmates telling the deputies that you were saying you wanted
9 to commit suicide?
10 A. Uh, um, yeah.
11 Q. And do you then recall telling the deputies that
12 you were joking?
13 A. Hmm, no.
14 Q. You don't recall that?
15 A. No.
16 Q. Did you tell them that?
17 A. I just said I don't recall.
18 Q. Well, I'm asking, you don't recall whether you told
19 them that?
20 A. Yeah.
21 Q. Okay. Because you said earlier that you were
22 joking, just a few minutes ago during your testimony you --
23 A. Yeah.
24 Q. -- were joking about it. But you were joking, at
25 that point?

Page 79

1 A. Yeah.
2 Q. Okay. Do you recall why you were joking about
3 committing suicide?
4 A. Um, because I was thinking about it.
5 Q. Okay. Did you think that would help you get
6 through booking quicker?
7 A. No.
8 Q. Okay. Did that allow you to get some additional
9 attention? Because I know you -- you had been trying to get
10 on the phone and get some information. Did it assist you in
11 getting any attention from the deputies?
12 A. No.
13 Q. But you -- What I'm hearing from you is that you
14 were thinking about it, so you joked about it to the other
15 inmates.
16 A. Yeah.
17 Q. Do you understand that because you filed a lawsuit,
18 assuming you're successful, there's a -- you can request a
19 certain amount of money? Do you understand that?
20 A. Uh, yeah.
21 Q. Okay. How much money are you seeking for this
22 lawsuit?
23 A. Um, just whatever the jury thinks is deserved.
24 Q. Okay. Do you have a -- You don't have a number in
25 mind, or you don't have an idea of what you think you

Page 80

1 deserve?
2 A. It's not about what I deserve.
3 Q. Okay. Tell me more.
4 A. I mean, you know, I feel like neglect and abuse in
5 the justice system is a big thing. Um, I, for one, have
6 experienced neglect and abuse in that jail several times in
7 the past and, you know, I've had times where I've had to beg
8 for water. Again, we've talked -- we've been over this
9 already. And I feel like, you know, in the jail systems
10 these cops are allowed to abuse people, and there's never any
11 repercussions or anything done against them, you know.
12 I've -- I've watched officers beat somebody with a
13 broomstick before, and then not even someone get written up.
14 And, yeah, I feel like stuff like that just needs to stop,
15 and I just want it to be made aware to the community --
16 Q. So -- I'm sorry. I'm sorry. I didn't mean to
17 interrupt you. Oh, were you finished? I wasn't trying to
18 interrupt, so if you have more to say, go -- you can go ahead
19 and finish your answer.
20 A. I'm done now.
21 Q. Okay. I'm sorry. Now, do you understand that if
22 you are successful, you would only get money, or damages as
23 they call it, for what would've happened to you on the night
24 of July 8th going into the early morning of July 9th. Do you
25 understand that?

Page 81

1 A. Yeah.

2 Q. Okay. So as it relates to that finite period of

3 time, do you have an idea of what you are looking for in

4 damages, or what you're going to -- what you're seeking?

5 A. I mean, I'm seeking, you know, for everybody to see

6 what's happening, you know, seeking for this to not happen

7 again in the future.

8 Q. Okay. So if you got no money and you were just

9 able to make it known what's happening, you would be fine

10 with that?

11 A. Only if there was change.

12 Q. Okay. How -- Okay. What change are you looking

13 for as it relates to what happened to you on July 8th and 9th

14 of 2024?

15 A. For nothing like that to happen to anybody again.

16 Q. Okay. Do you believe Erica Sanchez is responsible

17 for what happened to you?

18 A. Um ...

19 Q. What did you say?

20 A. She, uh ... Is she responsible for what happened

21 to me? Absolutely she takes some responsibility.

22 Q. How?

23 A. Well, as far as I've been aware, she was the nurse,

24 correct?

25 Q. Well, I can't answer questions.

Page 82

1 A. Oh, okay. Well, as far as I'm made aware, she was

2 the nurse and she was the person that should've been the one

3 to 1013 me and put me on suicide watch. So yeah, I believe

4 she was responsible.

5 Q. So you think you met the standard for 1013?

6 A. Absolutely.

7 Q. Based on what?

8 A. Based on my thoughts of suicide and --

9 Q. Which ones? Which thoughts? The ones where you

10 were joking, or the ones where you were yelling at Deputy

11 Tracey when y'all were going back and forth?

12 A. All of them, honestly, all of those.

13 Q. Have you ever been 1013 before?

14 A. Yes.

15 Q. How many times?

16 A. Um, several. I couldn't give you a number.

17 Q. Okay. So prior to July 8th, 2024, you've been

18 1013'd?

19 A. Yes.

20 Q. Have you been 1013 since July of 2024?

21 A. Like, yeah.

22 Q. Okay. How many times since July of 2024 have you

23 been 1013?

24 A. Just once.

25 Q. Was that around the time where you committed

Page 83

1 suicide earlier this year?

2 A. Um, yeah.

3 Q. Okay. I represent to you that during your mother's

4 testimony, she said that you told her you were sorry for what

5 you -- for attempting to commit suicide. Do you recall

6 saying that to her?

7 A. No, not exactly. I probably did.

8 Q. Okay. Are you sorry for trying to commit suicide?

9 A. Am I sorry? Am I sorry to her?

10 Q. Are you sorry for trying to commit suicide?

11 A. To who?

12 Q. Well, you said -- To anyone?

13 A. Uh, I'm sorry to my mom that I scared her.

14 Q. Did you ever ask to talk to medical or mental

15 health or any medical professionals while you were at the

16 jail on July 8th or 9th of 2024?

17 A. I might have.

18 Q. Do you recall doing it?

19 A. Uh, I recall telling them I was gonna kill myself.

20 Q. Well, that's a different question.

21 A. Well, when you say something like that, you're

22 supposed to talk to the medical professional.

23 Q. What makes you say that?

24 A. 'Cuz that's the law.

25 Q. What law are you referring to?

Page 84

1 A. I don't know. I mean, as far as I'm aware, that's

2 the law.

3 Q. Okay.

4 A. It's protocol.

5 Q. What protocol are you talking about?

6 A. Whatever protocol that every cop and hospital and

7 therapy and government workers tend to follow.

8 Q. Okay. So you're just guessing is what I'm hearing

9 from you.

10 A. Guess so.

11 Q. Okay. So when you told them that you -- When you

12 said to the inmates that you wanted to commit suicide and

13 then said you were joking, you -- is it your testimony and

14 they should have taken you to mental health at that point?

15 A. Absolutely.

16 Q. Okay. How often do you joke about committing

17 suicide?

18 A. Too often.

19 Q. Okay. So why should somebody know to take you

20 seriously, man?

21 A. Uh, because it's serious.

22 Q. But you're joking about it, yes?

23 A. Um, there's a little truth in every joke.

24 Q. Okay. So how is somebody who doesn't know you

25 supposed to know when you're serious about committing suicide

Page 85

1 if you joke about it?

2 A. I mean, they're not supposed to assume.

3 Q. But you said you were joking about it. They're not

4 assuming; you said that. You said you were joking.

5 A. I said it?

6 Q. So they can -- So they can take you at your word.

7 A. I said it to who?

8 Q. Is it your testimony you did not tell anybody at

9 the jail that you were joking about committing suicide in

10 July of 2024.

11 A. But who did I tell I was joking?

12 Q. You have to answer the question. You don't get to

13 ask it, okay?

14 A. Did I ask anybody if I was joking? What --

15 Q. (Indiscernible crosstalk.)

16 A. -- did I tell anybody that I was joking?

17 Q. Did you tell anybody you were joking --

18 A. Yeah, I told --

19 Q. -- about committing suicide?

20 A. Yeah, I told the other -- the other people in the

21 jail.

22 Q. Right. So they should take you at your word, yes?

23 A. The prisoners?

24 Q. Whoever you're telling.

25 A. Yeah.

Page 86

1 Q. Okay. So how would somebody know that you're not

2 joking if you're telling them you're joking?

3 A. They wouldn't.

4 Q. Right.

5 A. Right.

6 Q. Okay. After you were released from the hospital,

7 it's my understanding that you went to live with your mother

8 after your suicide attempt in July of 2024; is that right?

9 A. Yeah.

10 Q. How long did you live with your mother after

11 getting released from, I think it was Riverwood?

12 A. Hmm, a couple -- a couple months.

13 Q. Okay. And then you went back to your home?

14 Because you had a -- Do you still own a home right now?

15 A. I don't own a home.

16 Q. What's that?

17 A. I don't own a home.

18 Q. Okay. Where do you live right now?

19 A. I live in, uh, whose house do I live in? You

20 said -- What was the question?

21 Q. Where do you live right now?

22 A. At home.

23 Q. With?

24 A. With my girlfriend.

25 Q. Okay. What's the address?

Page 87

1 A. Y'all can ask for my address?

2 Q. Yes.

3 A. Oh. It's, uh, the whole address?

4 MR. SLATER: The whole address.

5 THE WITNESS: (Resuming)

6 A. [REDACTED]

7 [REDACTED]

8 Q. How long have you lived there?

9 A. Uh, on and off my entire life.

10 Q. Whose house is that?

11 A. Um, it's my grandpa's.

12 Q. Okay. Were you living there in 2024?

13 A. Uh, yeah.

14 Q. So after you left -- after you left your mother's

15 house, after you were released from Riverwood, you leave your

16 mother's house, did you go live at the Conyers address?

17 A. Yeah.

18 Q. Okay. Tell me about the fight you got into in

19 September of 2024.

20 MR. SLATER: '25.

21 MR. VEAL: No, it was 24.

22 MR. SLATER: Oh, okay.

23 THE WITNESS: (Resuming)

24 A. Um, the fight?

25 Q. Yes.

Page 88

1 A. I didn't get into a fight.

2 Q. Did you get punched in the nose?

3 A. Yes.

4 Q. Okay. So tell me about that.

5 A. I was listening to music, and my neighbor got mad

6 and walked over and punched me in the face.

7 Q. Okay. What did you do after you got punched in the

8 face?

9 A. Called the cops.

10 Q. Did anybody get arrested?

11 A. Nope.

12 Q. Eventually you went to the emergency room for that?

13 A. Yeah.

14 Q. Were there any permanent injuries?

15 A. Uh, not that they found.

16 Q. Do you disagree?

17 A. Yes.

18 Q. What permanent injuries did you sustain from the --

19 from the punch in the face?

20 A. My nose.

21 Q. What's the injury?

22 A. I don't know what it would called. My nose is

23 lopsided or something.

24 Q. Okay. But the doctors don't agree with you?

25 A. I can't afford to go to a doctor.

Page 89

1 Q. You went to the emergency room, right?

2 A. Yeah.

3 Q. There were doctors there?

4 A. No.

5 Q. So you did not see a doctor at the emergency room?

6 A. I saw a nurse.

7 Q. Okay. So you did not see a doctor at the emergency

8 room?

9 A. Um, they go by a lot of different names, you know,

10 I couldn't tell you.

11 Q. So you don't know whether you saw a doctor?

12 A. I saw a medical professional at the emergency room.

13 I don't know if it was a doctor or, you know, a nurse or a

14 radiologist or what.

15 Q. A radiologist is a doctor, but that's neither here

16 nor there. So you went to the emergency room, they did not

17 diagnose you with a permanent injury, correct?

18 A. Yeah.

19 Q. Okay. But you disagree because you believe you

20 have a permanent injury because your nose is lopsided; is

21 that what you said?

22 A. Uh, no, I did not use those words.

23 Q. Okay. What word did you use as far as your nose?

24 A. My nose is messed up.

25 Q. Okay. Your nose is messed up. Tell me about your

Page 90

1 mental health diagnoses. Do you have any?

2 A. I've been diagnosed with a lot of things at

3 different times.

4 Q. Okay. Tell me about them.

5 A. I've been diagnosed, uh, with schizoaffective, I've

6 been diagnosed with major depressive, uh, high risk of

7 suicide. Those are the only ones I could hundred percent say

8 for sure, but I mean, I've been given other stuff going on

9 too.

10 Q. Okay. Were you ever put on medication for the

11 schizoaffective?

12 A. Yeah.

13 Q. What kind of medication were you put on?

14 A. I don't remember.

15 Q. Okay. What about the major depressive disorder?

16 A. I don't remember.

17 Q. You don't remember whether you were put on

18 medication for it?

19 A. Unh-unh (negative).

20 Q. Okay. Were you ever taking -- Well, you were

21 prescribed medication for the schizoaffective, you don't

22 remember what it was. Did you ever take it?

23 A. For a little bit.

24 Q. Okay. Do you remember what time frame you would

25 have taken that medication?

Page 91

1 A. No.

2 Q. Do you remember when you were diagnosed with

3 schizoaffective?

4 A. Um, roughly.

5 Q. When?

6 A. Around 2019.

7 Q. What about your major depressive disorder?

8 A. Um, I got re-diagnosed with that in 2024.

9 Q. When was the first time you were diagnosed with

10 that?

11 A. A lot of times. I don't know.

12 Q. But you're saying you were re-diagnosed in 2024?

13 A. I mean, they -- Yeah, they wrote it on the paper

14 again.

15 Q. But before that, many times, just not sure when.

16 A. Yeah, you know, just other times in my life.

17 Q. I think you said you were diagnosed as a high risk

18 of suicide. When?

19 A. Uh, um, one week before I got locked up at the

20 courthouse.

21 Q. Okay.

22 A. Not even one week, like a couple of days.

23 Q. Who diagnosed you a couple of days before you went

24 to the courthouse?

25 A. Um, I think it was Viewpoint.

Page 92

1 Q. It's my understanding you got out of Viewpoint July

2 6th of 2024. Does that sound right to you? So about two

3 days before your court hearing.

4 A. Yeah.

5 Q. Is it your testimony that you were at Viewpoint

6 because you were suicidal?

7 A. Yeah.

8 Q. Yes? Why were you suicidal?

9 A. Uh, because I was unhappy with my life.

10 Q. But by the time you left Viewpoint and you went to

11 court on that Monday, you were no longer suicidal, correct?

12 A. What?

13 Q. By the time you left Viewpoint on July 6th and then

14 you went to court that Monday, July 8th, and you weren't

15 suicidal on that Monday?

16 A. That's not how that works.

17 Q. That's what I'm asking you -- I'm asking -- That's

18 why I'm asking you a question.

19 A. I mean -- I mean, that's -- Like, I wasn't

20 suicidal then? I don't understand what that means. That's

21 like a broad term, you know what I'm saying? I always think

22 about suicide, so I mean, technically, wouldn't that mean

23 that I am suicidal all the time if I think about it? Or does

24 suicidal mean you're actually acting on it? What means

25 you're suicidal and not, from your definition?

Page 93

1 Q. Well, my definition doesn't matter right now. I'm
2 trying to figure out what you mean by suicidal.
3 A. I mean, I don't understand what you mean by
4 suicidal. I would say yes, always.
5 Q. Okay. So in your opinion, you're always suicidal?
6 A. Yeah.
7 Q. Okay. I'm just trying to make sure. I'm trying to
8 get an understanding. You're always suicidal in your opinion
9 because you're always thinking; it's always on your mind or
10 you're always considering it or thinking about it; is that
11 fair?
12 A. Yeah.
13 MR. VEAL: Okay. All right. I
14 think -- I think I'm done, so I can let
15 somebody else go ahead. If I figure out
16 something else, I can ask something
17 later. Thank you.
18 MR. BUCKLEY: Does anybody need a
19 break? I don't need one, but --
20 MR. SLATER: I'm good. Do you need
21 a break? All right. Let's keep going.
22 MR. BUCKLEY: Mr. Smith, my name is
23 Tim Buckley. I represent Deputy Jackson
24 and Deputy Gomez. You testified at
25 length today, and a lot of it had to do

Page 94

1 with Deputy Tracey. I don't represent
2 her, so I'm not going to ask you a lot of
3 questions. Her lawyer is right here.
4 But what I do have, and I may jump around
5 a little bit because we -- Counsel has
6 done a good job covering topics.
7 EXAMINATION
8 BY MR. BUCKLEY:
9 Q. When you were in the jail in 2023 -- I mean 2022,
10 and attempted suicide, that was you attempted to put the
11 phone cord around your neck and they stopped you before you
12 could do it. Is that what happened?
13 A. Uh, well, I think they stopped me after I'd already
14 did it. But they came in pretty quick.
15 Q. Okay. Had you told anyone in 2022 that you were
16 suicidal before you did it?
17 A. Yeah.
18 Q. You did?
19 A. Yeah.
20 Q. All right. Did you bang on the door and kick the
21 door and --
22 A. I don't recall.
23 Q. -- bang your head on the wall and that kind of
24 stuff?
25 A. I don't recall all that.

Page 95

1 Q. Okay. So what do you recall?
2 A. From that night?
3 Q. Uh-huh (affirmative). From 2022?
4 A. Um, not a lot, but I remember, um, I remember what
5 I was told happened.
6 Q. By whom?
7 A. Uh, paperwork at the court.
8 Q. Paperwork at court?
9 A. Yeah.
10 Q. And what was your understanding of what you were
11 told?
12 A. They said I walked outside. The cops got called,
13 and I walked outside and apparently I pretended to pull guns
14 out from behind my back and had my fingers in the shape of
15 guns and then, uh, tried to get them to shoot me.
16 Q. That was how you got arrested, I take it? You
17 didn't do that in the jail cell?
18 A. No.
19 Q. Right.
20 A. Yeah, that's -- that's what the court paperwork
21 told me.
22 Q. Okay. I'm focused on once you got to jail. You
23 had told us earlier that you were really, really drunk so you
24 didn't remember much about it.
25 A. Right.

Page 96

1 Q. So do you now remember much about it? That you
2 reported you were suicidal and asked for help and you weren't
3 given it and then --
4 A. At the jail?
5 Q. Yeah.
6 A. No, I don't remember what happened at the jail.
7 Q. Oh, okay. Well, I'm asking you about while you
8 were in jail and attempted -- you attempted suicide in the
9 jail in 2022, right?
10 A. Yeah.
11 Q. With a phone cord in a holding cell, right?
12 A. Yeah.
13 Q. All right. I'm asking you, do you recall telling
14 people you were suicidal, pushing on buttons, banging on
15 doors, any of that --
16 A. No.
17 Q. -- in 2022?
18 A. No.
19 Q. Okay. So as we sit here today, you don't have any
20 criticism of how you were treated by the Rockdale County Jail
21 in 2022 because you don't know what happened before you put
22 that cord around your neck, right?
23 MR. SLATER: Object to the form.
24 THE WITNESS: (Resuming)
25 A. I do have criticism about the way that they treated

Page 97

1 me at that jail.
2 Q. How --
3 A. Just not about that exact moment because I don't
4 remember everything that happened in that moment.
5 Q. Right. I'm talking about during that time at the
6 jail, during that stay where you attempted suicide.
7 A. My entire time at the jail?
8 Q. That --
9 A. I was only drunk for the first night of getting to
10 the jail.
11 Q. Okay. So did you -- when did you attempt suicide?
12 Was it the first night?
13 A. Yeah, as soon as I got there.
14 Q. Okay. And so what I'm saying is from the time you
15 were booked in, until you attempted suicide, which they
16 prevented you, right?
17 A. I wasn't booked.
18 Q. What?
19 A. I don't believe I was booked.
20 Q. Okay. From the time you entered the jail and were
21 in the holding cell until you attempted suicide, what
22 criticism do you have of how the jail treated you up to that
23 time?
24 A. I don't remember.
25 Q. So none?

Page 98

1 A. I was drunk. I don't remember.
2 Q. Right. So you can't have criticism if you don't
3 remember, right? You don't know anything.
4 A. Yeah.
5 Q. Am I right?
6 A. Yeah.
7 Q. Okay. All right. We're here about a lawsuit and
8 you've said that the way the Rockdale County Jail treated you
9 on several occasions was wrong. So I'm trying to isolate
10 what was wrong since you filed the lawsuit, okay? So --
11 A. Yeah. That has nothing to do with why I tried to
12 hang myself. They treated me wrong after the fact, during my
13 entire stay, not just my initial stay.
14 Q. In 2022?
15 A. Yeah.
16 Q. Right. So that's my next question.
17 A. All right.
18 Q. So after you were prevented from committing suicide
19 in 2022, what happened after that? Did you go to the
20 hospital?
21 A. No.
22 Q. Okay. Do you think you got the cord around your
23 neck and became non-responsive like you did in the recent
24 attempt? Or how far do you think you got?
25 A. I don't recall.

Page 99

1 Q. Okay. Because you were drunk?
2 A. Yeah.
3 Q. All right. So you don't know how -- what level of
4 crisis you reached in terms of what you did, right?
5 A. Yeah. No.
6 Q. Okay. So what do you next recall about that time
7 in jail? And as we go along, tell me what your criticism is
8 of Rockdale County from your time in jail in 2022.
9 A. Uh, well, they locked me in a room, like, by myself
10 and they, like, didn't let me have any phone calls. And they
11 kept telling me that it was the next shift's problem and the
12 next shift wouldn't let me. They only let me shower, like,
13 every three days. And, you know, again, I was locked in that
14 room with no one to talk -- it was literally solitary
15 confinement, but at the front. And then when they finally
16 started to move me, they moved me into like, they called it
17 like a detox area. And I remember counting. I spent 11 days
18 in that area and you're only supposed to spend three days
19 there. But they let me stay there the entire 11 days. And I
20 remember when I asked them why, they said, because you didn't
21 tell us it was time for you to get moved back. So because
22 they just didn't know what they were doing, they left me
23 there in a room I shouldn't have been in for 11 days. And,
24 you know, I felt, you know, like I was lost and forgotten
25 about and abandoned. So for an entire 11 days of my 59 day

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1 stay, I wasn't allowed to make my very first phone call to my
2 family to even let them know where I was and what had
3 happened.
4 Q. Okay. Did you -- Do you know if during that time
5 in jail you were placed on suicide watch?
6 A. Yeah.
7 Q. Okay. You're telling me you know. Were you?
8 A. Yeah.
9 Q. Okay. And you're critical of how you were treated
10 while on suicide watch, right?
11 A. No.
12 Q. No? How long were you on suicide watch?
13 A. A day or two.
14 Q. Okay. And then you were put in this other cell.
15 Were you allowed to put your regular orange jumpsuit, or
16 whatever, on? Your coveralls --
17 A. Yeah. --
18 Q. -- back on at that point?
19 A. Yeah.
20 Q. All right. Did you attempt suicide again during
21 that stay?
22 A. No.
23 Q. Did you threaten to?
24 A. No.
25 Q. Did you ask for help, bang on the door, press the

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1 button, beat your head on the wall during any of that stay?

2 A. Yes.

3 Q. You did? Okay.

4 A. Yes.

5 Q. And what was the response to that?

6 A. Um, normally they would come and, you know,

7 normally give you the answers you were trying to get or

8 something along those lines, at least give you a response.

9 Q. Okay. Anything else during that stay that you are

10 critical of Rockdale County Sheriff's Office about?

11 A. Yeah.

12 Q. Let's hear it.

13 A. I got attacked and, uh, they didn't do nothing

14 about it.

15 Q. By another inmate?

16 A. Yeah.

17 Q. Okay. What happened?

18 A. Uh, he got up and just started hitting me.

19 Q. Did you file a grievance?

20 A. Yeah.

21 Q. Okay.

22 A. Well, I pressed the button and I filed a grievance

23 and all that.

24 Q. So you filled out paperwork of --

25 A. Yeah.

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1 Q. -- of grievance?

2 A. Yeah.

3 Q. All right. And how long after that happened were

4 you released?

5 A. After I got attacked?

6 Q. Yeah.

7 A. Probably like a month-and-a-half.

8 Q. Okay. What was the charge you were in jail for?

9 A. What was I in jail for?

10 Q. Yes.

11 A. I don't remember.

12 Q. Okay. But at the time of your arrest you did this

13 thing where you pulled finger guns out trying to get the

14 police to shoot you. Were you trying to get them to shoot

15 you?

16 A. Uh, I mean, if that's what I was doing, yeah. I

17 mean, I know the state of mind I was in at that time and it

18 was pretty much always wanting to die, talking about it.

19 Q. During the 2022 time in the jail, you actually

20 attempted suicide, right?

21 A. When? '22?

22 Q. 2022.

23 A. I mean, yeah.

24 Q. Okay. And then you were put on suicide watch.

25 A. Yeah.

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1 Q. And then you were taken off suicide watch and you

2 were there for, what, approximately another month, month-and-

3 a-half?

4 A. Yeah.

5 Q. Yeah?

6 A. Yeah.

7 Q. And you did not attempt suicide any more times

8 during that time, right?

9 A. Right.

10 Q. Did you joke about it the rest of the time you were

11 there or --

12 A. Yeah.

13 Q. -- tell people you were going to?

14 A. Yeah.

15 Q. Okay. So that's part of how you are. You joke

16 about that you're going to kill yourself on an ongoing basis,

17 right?

18 A. Sometimes, yeah.

19 Q. Okay. But during that stay for a month-and-a-half

20 after you were taken off suicide watch, you -- you joked

21 about it but you didn't attempt suicide again during that

22 time, right?

23 A. Yeah.

24 Q. Okay.

25 A. No.

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1 Q. No?

2 A. No.

3 Q. No, what?

4 A. I did attempt. I attempted, but I didn't attempt

5 like, like, I mean, like, I could elaborate if you want me

6 to.

7 Q. Sure.

8 A. Like, there's times I'd be under the blanket and

9 I'd tie the blanket around my neck and I'd pull it as tight

10 as I could and then, like, you know, I'd pass out but then

11 because my arms loosened up, I'd just wake back up. So it

12 was unsuccessful. But yeah, I would joke about it all the

13 time, and then there were more than one occasions where I

14 would, like, literally fall asleep that night trying to

15 strangle myself and just not being able to really find a good

16 way to do it with a room full of four people.

17 Q. And then you'd wake up the next day?

18 A. Yeah.

19 Q. Yeah. So you didn't require hospitalization for

20 these tying-the-blanket-around-your-neck incidents, right?

21 A. Unh-unh (negative).

22 Q. You have to say yes or no.

23 A. No.

24 Q. Any other attempts during that stay?

25 A. I mean, like, like I said, that was -- that would

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1 be the furthest I would go.
2 Q. Okay. What was the fight with the, or the attack,
3 what prompted the attack by the other inmate? Do you know?
4 A. Um, well, there was something between him and
5 another inmate.
6 Q. Did it have anything to do with you being suicidal?
7 A. No.
8 Q. Okay. In the most recent, the attempts of suicide
9 that you talked about this year, it was in June of this year;
10 is that right?
11 A. Yeah.
12 Q. And that involved your girlfriend?
13 A. Yeah.
14 Q. That's not the same woman that you were with when
15 you were in the jail --
16 A. No.
17 Q. -- in 2024, right?
18 A. No.
19 Q. That's your wife?
20 A. Which one?
21 Q. 2024?
22 A. Yeah.
23 Q. Are you still married to her legally?
24 A. Yeah.
25 Q. Do y'all have -- y'all have a child together?

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1 A. No.
2 Q. Do you have any children?
3 A. Um, um, none that I personally know.
4 Q. What does that mean?
5 A. It means I've -- I've -- I've heard things, but I
6 can never verify.
7 Q. Okay. No one has come forward and proven that you
8 are the father of their kid?
9 A. Yeah.
10 Q. Okay. What was the dispute between you and your
11 current girlfriend about that led you to attempt suicide?
12 A. Um, she was -- I thought that she was, um, she was
13 at her, uh, her husband's house.
14 Q. And what, you became jealous?
15 A. Um, well, we kind of got into an argument about it.
16 Q. Were you in her presence when you attempted
17 suicide?
18 A. Not in the same room.
19 Q. Same house?
20 A. Yeah.
21 Q. The house where you live now that you just gave the
22 address to?
23 A. Yeah.
24 Q. Okay. How did you attempt suicide?
25 A. I used the HDMI cable.

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1 Q. Okay. Tried to hang yourself?
2 A. Yeah.
3 Q. Did you actually loop it over something and try to
4 hang yourself?
5 A. I didn't loop it over anything, but I -- I didn't
6 loop it. I put it through a door and closed the door on it.
7 Q. Okay. Did you lose consciousness?
8 A. Yeah.
9 Q. Did you end up in the hospital?
10 A. Yeah.
11 Q. How long were you in the hospital?
12 A. Um, seven -- seven to ten days.
13 Q. What hospital was that?
14 A. Well, it was at Rockdale and then I had to get, uh,
15 I had to get taken to a new one.
16 Q. Were you admitted to a psychiatric facility as any
17 part of that?
18 A. No.
19 Q. Did you receive counseling or therapy during the
20 seven to ten days that you were in hospital?
21 A. No.
22 Q. Were you transported by ambulance?
23 A. Yes.
24 Q. Who called the ambulance?
25 A. Uh, I think my girlfriend did.

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1 Q. In the attempt at suicide at a group home in 2017,
2 you said you were being abused by the group home manager,
3 right?
4 A. Yeah.
5 Q. In what way? Physically? Sexually?
6 A. Um, I didn't -- I just felt like I was being
7 abused.
8 Q. Okay. Was there a police investigation or a report
9 to police?
10 A. No.
11 Q. So we have 2017, 2025, 2022, and 2024 as documented
12 attempts at suicide. If I understand you, there are moments
13 or episodes where you will do things that are suicidal, like
14 tie the blanket around your neck but then wake up the next
15 morning, and those are suicide attempts too, right?
16 A. Well, at that point, that was the closest thing I
17 could get to it. Yeah. In that moment, that was, you know,
18 as much as I could do in my desperation in a cell with four
19 people. Yeah, I hid under the blanket and that was the
20 furthest I could go.
21 Q. Okay. My question is, are periodic efforts at
22 suicide perhaps that don't result in you going to the
23 hospital something that's an ongoing thing in your life?
24 A. Do what?
25 Q. Well, for example, some of the attempts in 2022,

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1 you tied something around your neck and then woke up in the
2 morning and it had come loose and --
3 A. That's because I was in jail.
4 Q. I understand that. Let me finish my question. You
5 would go through that and then there wasn't a report to the
6 police or to the jail or you didn't go to the hospital; that
7 was just the end of it, in that moment, right? What I'm
8 asking you is, in your outside life, in your life, say, over
9 the last ten years, are periodic efforts like that something
10 that is ongoing in your life? You'll do something that is
11 suicidal in nature, be it take pills and then throw up, or
12 jump off something, or tie something around your neck and not
13 succeed. Are there episodes like that that you haven't told
14 us about?
15 A. No.
16 Q. Okay. Deputy Gomez, do you have any recollection
17 of any personal interaction with Deputy Gomez?
18 A. Yes.
19 Q. All right. Tell me about that.
20 A. When?
21 Q. Start the first time you met him and any time after
22 that?
23 A. Uh, well, I remember he was a rookie in training
24 when I first got to jail. He was --
25 Q. First got to jail in 2024 or 2022?

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1 A. Uh, the little week or two I did before I hung
2 myself. It was like '24.
3 Q. Okay. Let me -- Let me ask it clearer. In 2022
4 you were housed in the Rockdale County Jail?
5 A. Yeah. Not then.
6 Q. You didn't meet him then, right?
7 A. No.
8 Q. You didn't interact with him at all as far as you
9 know, right?
10 A. Yeah.
11 Q. Deputy Jackson, did you meet her then?
12 A. Not that I recall.
13 Q. To your knowledge, you didn't interact with her at
14 all during that stay, right?
15 A. Not that I recall.
16 Q. Okay. All right. 2024 was the first time that
17 you're aware of that you interacted with Deputy Gomez?
18 A. Yeah.
19 Q. Okay. All right. Tell me about that. You said he
20 was a deputy in training.
21 A. I think so, yeah. And he -- I think they left him
22 in there to watch everybody for the day, so he was just the
23 guy that was watching everybody that day.
24 Q. Okay. What other interaction did you have with
25 him?

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1 A. Um, well, the only one-on-one interaction I can
2 think of is I remember when I was in the cell, they had given
3 me some shoes, but like, I guess there was something wrong
4 with the shoes that they gave me because my foot started
5 breaking out and it started, like, hurting and it was itchy.
6 And I knocked on the window and I remember it was Gomez was
7 the one that had came up to the window, and then I begged him
8 for new shoes. And so he actually went and got me some new
9 shoes to put on.
10 Q. Okay. Any other interaction with him that you
11 recall?
12 A. Um, well, um, no.
13 Q. All right. When you were telling your story or
14 telling us about when you were pressing the button and
15 knocking on the window and so forth, and various deputies or
16 people would appear or not come, you didn't interact with him
17 during that, right?
18 A. Um, if I did, it was -- if I did, it was when he
19 pulled out the last person, and then I probably just asked
20 him what was taking so long. And I probably just got a short
21 answer, like, he didn't know and he was doing his best or
22 something.
23 Q. Okay. No discussion about suicide to him?
24 A. No.
25 Q. All right. In this earlier part of the day where

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1 you were joking around with the other inmates about killing
2 yourself, you didn't interact with Gomez during that, right?
3 A. Um, I don't believe so.
4 Q. Okay. What, if any, criticism do you have of what
5 Deputy Gomez did, to your knowledge, on the occasion that you
6 were there in 2024?
7 A. Um, well, if you see something, you're supposed to
8 say something. I guess that would be the only thing.
9 Q. What is it that you know that he saw?
10 A. Um, just the -- just the, um, the escalating
11 confrontation between me and Tracey.
12 Q. Okay. Do you know what details he knew about what
13 that escalation was?
14 A. No.
15 Q. Do you have any other knowledge about what Deputy
16 Gomez did or didn't do while you were there in 2024?
17 A. No.
18 Q. Okay. Deputy Jackson, when was the first time you
19 were aware of -- Do you know who she is?
20 A. Um, not -- no, not exactly.
21 Q. Okay.
22 A. She could be the other woman that answered the
23 button that hung up.
24 Q. Okay. The other woman that answered the button
25 that hung up, describe her to me.

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1 A. She was the lady that was working behind the
2 counter with Tracey.
3 Q. Okay. But physically describe her. Was she
4 African-American? Is that funny?
5 A. There's -- There's only two women that were there.
6 Yeah. She was African-American and she had hair. She --
7 She stood about average height, maybe a little shorter. She
8 wore a cop outfit and -- I mean, you know, I couldn't -- If
9 there was a police lineup, I could point her out, but I
10 couldn't describe her to you like that.
11 Q. Okay. If -- If the volume of your interaction
12 with Tracey is a case of Coca-Cola, how many cans of
13 Coca-Cola is your interaction with Jackson? Case has 24
14 cans.
15 MR. SLATER: I'm going to object to
16 the form of that question.
17 MR. BUCKLEY: You can object to it.
18 BY MR. BUCKLEY: (Resuming)
19 Q. Go ahead, answer it. If the volume of your
20 interaction with Tracey is a full case, 24 Cokes, how many
21 cans of Coke is your interaction with Deputy Jackson?
22 MR. SLATER: Same objection.
23 THE WITNESS: (Resuming)
24 A. I'm so confused. I mean, uh, I don't know how to
25 answer that.

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1 Q. All right. Well, answer it this way. You talked
2 about the escalation.
3 A. I don't never remember Jackson standing at the
4 window yelling nothing at me.
5 Q. Okay. So far less interaction with Jackson than
6 with Tracey. Yes?
7 A. Yeah.
8 Q. You're comfortable with that term. A lot less,
9 right?
10 A. Yeah.
11 Q. Okay. In terms of you actually communicating with
12 Jackson, you don't recall you having any communication with
13 her, correct?
14 A. Um, none that I could 100 percent verify was her.
15 The only thing that I could say is if, you know, the records
16 of what happened on that jail that night show that she was
17 the one that answered the button when Tracey told her to hang
18 it up, then I could verify in that moment, yes, I did speak
19 to her at least that one time.
20 Q. And in terms of this, the conversation you had with
21 her, if this was her, you pressed the button and she came to
22 the window, you don't recall if you said --
23 A. She didn't come to the window.
24 Q. Okay.
25 A. She answered the button.

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1 Q. She answered the button, the --
2 A. Yeah.
3 Q. -- the button on the door?
4 A. Yeah.
5 Q. All right. You don't recall whether that
6 communication included you saying you were suicidal.
7 A. No, I told her I was going to kill myself.
8 Q. Okay. You did?
9 A. Yeah. When that person answered the button, I told
10 them I was going to kill myself. I was suicidal.
11 Q. Okay. And then is it my understanding that you
12 overheard Tracey tell her, turn off the button?
13 A. Yeah. She yelled for me to, like, fucking kill
14 yourself and then told her to hang up the button on me, which
15 she listened and did hang up the button and walked away.
16 Q. Okay. Other than that time with Jackson, did you
17 ever tell her you were contemplating suicide?
18 A. Not that I recall.
19 Q. Okay. When you did press the button and she
20 responded, you had already told Tracey multiple times that
21 you were thinking about suicide, right?
22 A. Yeah.
23 Q. And she had not responded, not put you on suicide
24 watch, et cetera, right?
25 A. She told me to do it. That was her response, but

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1 yeah.
2 Q. Okay. Among other things, she -- but she didn't
3 take you out of the cell, put you on suicide watch. You had
4 been in the jail in 2022 and had been put on suicide watch,
5 right?
6 A. Yes.
7 Q. That didn't happen, despite you saying it to Tracey
8 multiple times, right?
9 A. Yes.
10 Q. All right. So is it fair to say that your sense
11 was when you said something to this other deputy, Tracey said
12 turn off the button, and she was in charge?
13 A. Yes.
14 Q. Okay. When you first got to the jail in 2024, you
15 did recall that you had been in that jail a couple of years
16 before?
17 A. Yeah.
18 Q. And that when you were there, you had been on
19 suicide watch?
20 A. Yeah.
21 Q. And the suicide watch was meant to prevent you from
22 committing suicide?
23 A. Yes.
24 Q. When you were brought to the jail, did you ask at
25 the time you were brought in to be put on suicide watch?

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1 A. No.
2 Q. Okay. Why not?
3 A. Because I was fine.
4 Q. So you had just come out of the time at Viewpoint
5 and at the crisis center that ended on July 6th, right?
6 A. Yeah.
7 Q. And that was because you were suicidal?
8 A. Yeah.
9 Q. And here we are on the 8th and you've told us that
10 you're always thinking about suicide, right?
11 A. Yeah.
12 Q. So when you went in just two days later after
13 coming out of a crisis center, being arrested for something
14 that you didn't do, why didn't you ask to be put on suicide
15 watch?
16 A. Uh, because I knew I was arrested for something
17 that I knew I didn't do.
18 Q. Okay. And so that made you not suicidal?
19 A. Um, it made me content with the situation I was in.
20 Q. Okay. Have you spoken with Deputy Gomez or the
21 African-American woman deputy since the time of your suicide
22 attempt?
23 A. No.
24 Q. Do you recall seeing them or interacting with them
25 once you were revived and on the gurney or in the ambulance?

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1 A. No.
2 Q. This deputy that you talked about asking questions
3 to in the ambulance, that wasn't Gomez?
4 A. No.
5 Q. It was a male deputy though?
6 A. Yes.
7 Q. Okay. You talked earlier, when you were asked
8 about what you want to happen with the jury in this case, and
9 you talked about officers beating up people with no
10 consequences. Have you observed that in the Rockdale County
11 Jail?
12 A. Yes.
13 Q. When?
14 A. Uh, several times.
15 Q. Okay. When have you been there other than '22 and
16 '24?
17 A. I haven't.
18 Q. Okay. So on both those occasions?
19 A. Yes.
20 Q. So on the 24th when you got there and by that
21 evening attempted suicide, you saw prisoners being beaten by
22 deputies during that time?
23 A. From getting there to that evening? I don't
24 recall. I was drunk.
25 Q. No, no. I'm in 2024.

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1 A. Oh.
2 Q. You got there on the 8th and attempted suicide
3 within hours of arriving. I'm asking you, did you see
4 deputies beating prisoners during that time?
5 A. No.
6 Q. Okay. So when you're talking about deputies
7 beating prisoners, you're talking about in your 2022 stay?
8 A. No, I'm talking about 2024 and 2022.
9 Q. Okay. So when in 2024 did you see prisoners being
10 beaten by deputies?
11 A. I didn't see it. I experienced it.
12 Q. You?
13 A. Yeah.
14 Q. You were beaten during --
15 A. Yes.
16 Q. -- that stay?
17 A. Yes.
18 Q. At what point was that?
19 A. Um, well, it wasn't the stay that I hung myself.
20 It was like -- It was like a month prior when I was there
21 for, like, two weeks.
22 Q. Okay. So you were at Rockdale at a time other than
23 '22 and the one in '24 where you tried to hang yourself?
24 A. Yes and no, 'cuz I was there. I got off on bond,
25 and then they locked me up for no reason and then sent me to

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1 Rockdale and, you know what I'm saying? So I mean, I think
2 I'm confused now 'cuz yeah, I was there for a couple days
3 before, then I got out. And then like, I think I went to a
4 hospital and then from the hospital, you know, I went to
5 court and then from the court, I died, and then from dying I
6 went to another hospital. So I mean, yeah, like two weeks
7 before or maybe a month before or very soon before, yeah, I
8 was locked up for like a week or two.
9 Q. So during --
10 A. Which I think we did talk about when I said I
11 saw -- I had got my hair cut. Me and him talked about it.
12 Remember I had got my hair cut and then I said that she was
13 the one that told me it looked good a couple weeks prior?
14 Q. So that was on a stay before the night of your
15 suicide attempt?
16 A. Yeah.
17 Q. And it was Deputy Tracey?
18 A. From what I recalled. From what I thought I
19 remembered, it was Deputy Tracey. I could be wrong though.
20 Q. All right. During that stay that I'm now realizing
21 you're saying that was the third time that you were in the
22 Rockdale.
23 A. No. That would be the second time.
24 Q. Third, total.
25 A. The third time would be when I hung myself.

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1 Q. Yeah. It's the third one we're talking about --
2 A. Yeah.
3 Q. -- the second in order. Okay? We're in agreement?
4 A. Yeah.
5 Q. Yeah. During that second stay did you interact
6 with Deputy Gomez?
7 A. Yeah.
8 Q. You did? All right. Tell me about that.
9 A. Yes. Well, I didn't -- like, not one on one, but
10 as I said he was the one over the pod that day.
11 Q. Okay. Was the shoe thing during that stay or
12 during this stay?
13 A. No. That was --
14 Q. The third stay?
15 A. The third stay.
16 Q. Okay. So you saw him there and he was a jailer and
17 didn't have any --
18 A. Well, he was the jailer of the block or the dorm,
19 you know.
20 Q. Yeah.
21 A. I didn't have much to say to him, but you know, he
22 was the one running everyone.
23 Q. Right. Bear in mind, sir, you filed a lawsuit so
24 I'm asking that so that you can tell me was there anything he
25 did that was remarkable other than be a jailer when you were

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1 there on your second stay? Did he do anything? Did he
2 mistreat you? Did he --
3 A. No.
4 Q. -- beat you?
5 A. No.
6 Q. Did you witness him beating prisoners?
7 A. No.
8 Q. Okay. This African-American female deputy who was
9 told turn off the button on the night that you attempted
10 suicide --
11 A. Yeah.
12 Q. -- did you interact with her during this two-week
13 stay about a month before at the Rockdale --
14 A. Not that I specifically recall.
15 Q. Okay. Did you witness her beating prisoners?
16 A. No.
17 Q. Okay. So during that time, you said you saw
18 deputies beating prisoners right, and including you?
19 A. In 2022 I saw it. In 2024 I experienced it, yeah.
20 Q. Okay. So during this two-week stay not the time
21 number three when you committed -- attempted suicide, you
22 were beaten by jailers?
23 A. Yes.
24 Q. All right. Do you remember which ones?
25 A. Uh, I remember his face, not his name.

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1 Q. Okay. Was it a black face or a white face?
2 A. It's a black face.
3 Q. Okay. Was he tall? Short?
4 A. Kinda short.
5 Q. All right. Did he have -- Do you remember what
6 his rank was? Did he have chevrons on his arms, or bars on
7 his collar?
8 A. No.
9 Q. Okay. Did you file a grievance?
10 A. Yes.
11 Q. Okay. Was any action taken on it?
12 A. Not that I'm aware of.
13 Q. Do you claim any current injuries from that
14 beating?
15 A. No.
16 Q. Do you tie your attempted suicide the next time you
17 came into the jail to anything that happened to you during
18 this two-week stay?
19 A. Uh, yes.
20 Q. Okay. Explain.
21 A. Well, because it's like patterns, you know. I
22 realized then that was the time where they had turned off my
23 water. They had me locked in a room, so I went like a day or
24 two with no water. And then they had taken my blankets at
25 one point. So I remember sitting there begging and screaming

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1 for water, and, you know, they weren't bringing any water.
2 And I just kept screaming and begging and banging on the
3 door, and I think at one point they like opened the door to
4 tell me to be quiet or something. And like I reached my hand
5 out so they couldn't close the door on me, and so they opened
6 the door back up and they kicked me in the face. And I ended
7 up having two black eyes. So I think it was like the next
8 morning when they went to transfer me out of the room, like
9 both my eyes were swollen black shut and, yeah, for like a
10 week I really couldn't open my eyes all the way.
11 Q. Okay.
12 A. And so, you know, when I compare that, you know
13 what I'm saying, and the hopelessness I felt in that
14 situation and, like, the genuine danger I felt when I was
15 brought, you know, fast forward to the, you know, most recent
16 time there. You know, I'm in the room. I'm being told that
17 I've been here this many more hours but I'll still stay
18 there. It doesn't matter how I feel. And you know, there's
19 no water in that cell. There's no running water, there's,
20 you know what I'm saying, I need something to drink. Like,
21 you know what I'm saying, there's no bed or blanket for me,
22 you know what I'm saying. I've watched everybody get
23 processed around me, and now it's reminding me of this stay
24 before where I was locked in this room with no water and I
25 didn't get water until I begged and pleaded for a whole day.

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1 Somebody please help me; I need water. I'm dehydrated;
2 please help me. And I'm kicking and banging on the door. So
3 yeah, those two moments did. They -- They kind of went
4 hand-to-hand, you know. It was like a PTSD trauma response
5 moment. I really didn't know, like -- So yeah, I would
6 definitely say that those two things, you know, go together.
7 **Q. All right. During the stay earlier in '24 for the**
8 **two weeks, you did not attempt suicide during that stay,**
9 **correct? Or did you do the blanket --**
10 A. No. No, I didn't.
11 **Q. -- and that stuff.**
12 A. No, I didn't.
13 **Q. All right. You didn't, not at all. All right. So**
14 **with this lack of water and all that, you didn't attempt**
15 **suicide during that stay, correct?**
16 A. No.
17 **Q. All right. And if I understand you, you're saying**
18 **that when you came back into the jail and on that night or**
19 **into the next day you attempted suicide, you're saying part**
20 **of the reason you think you tried it was because of the**
21 **experience you had had recently when you were in the jail?**
22 A. Yes.
23 **MR. BUCKLEY:** Okay. I don't think I
24 have any other questions.
25 **MR. WAYMIRE:** Off video at 3:24.

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1 (Whereupon, a brief discussion
2 ensued off the record.)
3 **MR. WAYMIRE:** On video, 3:25.
4 RE-EXAMINATION
5 **BY MR. VEAL:**
6 **Q. Hopefully this will be brief. What, if anything,**
7 **did you review to prepare for your deposition today?**
8 A. Nothing.
9 **Q. Nothing? Okay. Do you recall having any**
10 **communications with Erica Sanchez?**
11 A. No.
12 **Q. Do you have any idea what, if any, information she**
13 **had about you on the night of July 8th --**
14 A. No.
15 **Q. -- or early morning hours on July 9th, 2024?**
16 A. No.
17 **MR. VEAL:** Okay. That's all I have.
18 All right.
19 **MR. SLATER:** All right. Let's take
20 a break.
21 **MR. WAYMIRE:** Off video, 3:26.
22 (Whereupon, a brief recess was
23 held.)
24 (Whereupon, Mr. Veal exits the in-
25 person proceedings and rejoins via

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1 telephone.)
2 (Whereupon, Mr. Filipovits exits the
3 proceedings.)
4 **MR. WAYMIRE:** On video at 3:35.
5 **MR. WAYMIRE:** Mr. Smith, I'm Jason
6 Waymire and I represent Deputy Monique
7 Tracey, and I have some more questions
8 for you. I know you're happy to hear
9 that. I'm hopefully not going to replot
10 old ground that we've already gone over.
11 I may have a little bit of that, but
12 hopefully my questions are pretty new and
13 fresh.
14 **EXAMINATION**
15 **BY MR. WAYMIRE:**
16 **Q. Here's the first one. I understand from reading**
17 **certain records that you have a history with THC Delta pens;**
18 **is that right?**
19 A. I'm sorry?
20 **Q. A THC Delta pen.**
21 A. Yeah.
22 **Q. All right. Tell us what that is.**
23 A. Um, a THC Delta pen?
24 **Q. Right.**
25 A. Uh, I guess when you say that it makes me think of

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1 the gas station pens you could buy.
2 **Q. Okay. And have you -- have you ever bought one and**
3 **used one?**
4 A. Yeah.
5 **Q. All right. So I've never done that. I don't -- I**
6 **don't know how that works. Is it basically a vape pen?**
7 A. Yeah.
8 **Q. All right. And then it gives you a -- a THC high**
9 **of some sort?**
10 A. Yeah.
11 **Q. All right. And how long does that last?**
12 A. Um, probably like an hour, maybe two.
13 **Q. All right. So I have a medical record that says**
14 **that you use those daily, at least as of May of 2024; is that**
15 **true?**
16 A. Yeah.
17 **Q. And was that the case leading up to July of 2024?**
18 **You kept using those things daily?**
19 A. No.
20 **Q. Okay. When did you stop?**
21 A. Um, I stopped doing everything the day I got out of
22 jail the first time. So there have been several jail stays.
23 A. The first -- The second time, the second leading
24 into the third.
25 **Q. All right. Well, let me -- let me give you some**

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1 dates and then we can -- then you can hopefully pinpoint when
2 you stopped using everything, as you say. All right. So
3 I've got one in November of 2022 in Rockdale. Then I've got
4 one in May of 2024 in Rockdale, and then I've got July 8th
5 and 9th of '24 in Rockdale.
6 A. In May.
7 Q. All right. So after May, after the May
8 incarceration in Rockdale, you stopped at least using THC
9 Delta pens.
10 A. Yes.
11 Q. Is that correct?
12 A. Yes.
13 Q. All right. And have you used that, any of those
14 since?
15 A. Yes.
16 Q. And when did you start back up?
17 A. Um, pretty much directly after the situation in
18 July.
19 Q. And then has that -- has that been like daily
20 usage?
21 A. Yes. Yes.
22 Q. One a day? Two a day? How many are we talking
23 about?
24 A. One what a day?
25 Q. One a day?

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1 A. One? One, what a day?
2 Q. Oh, a Delta pen.
3 A. A Delta pen?
4 Q. A THC pen. Yeah.
5 A. Oh, Lord. Um, like one Delta pen a month.
6 Q. One Delta pen a month? All right.
7 A. Yes, sir.
8 Q. Okay. And when was the last time that you used one
9 of those?
10 A. Last night.
11 Q. All right. What time was that?
12 A. Uh, what time. I'd say roughly 11:30.
13 Q. And right now it is roughly 3:40 p.m., correct?
14 A. Sounds about right.
15 Q. That's what my watch says. All right. I have that
16 in May of 2024 you drank alcohol daily; is that true?
17 A. Uh, up to that point, yeah.
18 Q. And the -- I think the record says two liters per
19 week and you couldn't recall the last time you were sober.
20 Is that true as of May 2024?
21 A. Was that in May 2024?
22 Q. That's when the record is from.
23 A. Um ...
24 MR. SLATER: Sorry. You're saying
25 what happened?

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1 THE WITNESS: (Resuming)
2 A. That sounds like a record from 2022.
3 Q. And I'm just asking you, what -- what's the case?
4 Because it says you drank daily, roughly two liters per week,
5 you couldn't recall the last time you were sober. What time
6 frame do you think that applies to?
7 A. I remember saying that in 2022 because I slowed
8 down on my drinking a little bit in 2024, but maybe that's
9 how I felt in that moment.
10 Q. All right.
11 A. So ...
12 MR. SLATER: What record are you
13 referring to, Jason?
14 MR. WAYMIRE: I believe it's a
15 NavCare record. I think it is.
16 BY MR. WAYMIRE: (Resuming)
17 Q. All right. So in May of 2024 and going into July
18 of 2024, what was your alcohol intake like?
19 A. None.
20 Q. Zero?
21 A. Zero.
22 Q. And what -- what caused that change?
23 A. Um, uh, I thought -- I thought it would help with
24 the confrontation me and my wife was having.
25 Q. Moving to July 8th of 2024, the incident that you

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1 sued about, when you got to Rockdale County Jail, were you
2 under the influence of any kind of substance?
3 A. No.
4 Q. So you were stone cold sober?
5 A. Yes.
6 Q. You were asked whether you've been involved in any
7 other lawsuits and you said no. What I'm wondering is, you
8 could make a claim against somebody for something and it
9 doesn't turn into a lawsuit, but you made a claim. So I'm
10 wondering, have you ever made any other claims?
11 A. No.
12 Q. Like for a car accident and settled out of court --
13 A. No.
14 Q. -- or some kind of business like that?
15 A. No.
16 Q. Workers' comp?
17 A. No.
18 Q. Ever filed bankruptcy?
19 A. No.
20 Q. Have you watched any videos relating to this
21 incident, this case?
22 A. What do you mean?
23 Q. Have you watched any videos relating to this case?
24 There are a couple videos. Have you watched any videos?
25 A. Oh, yeah.

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1 Q. You have?
2 A. Yeah.
3 Q. When was the last time you watched any?
4 A. Uh, when I first got it.
5 Q. Which was months ago? A year ago?
6 A. I think, I want to say about a year ago.
7 Q. Well, not within the last couple days?
8 A. No, definitely not.
9 Q. The video that you saw, there's -- there's two
10 major videos -- well, three. Three main videos that I know
11 about. One is from outside the cell, one is from inside the
12 cell, and one is officer body camera video. Do you know
13 which of those you reviewed?
14 A. Yeah.
15 Q. Which?
16 A. Uh, the one from the cell.
17 Q. From inside the cell?
18 A. Yeah.
19 Q. All right. So I have a -- a screenshot here. It's
20 from inside the cell, and it's 1:30:59 is the -- is the stamp
21 on it, the time stamp.
22 MR. SLATER: Which video?
23 MR. WAYMIRE: Huh?
24 MR. SLATER: You said inside the
25 cell?

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1 MR. WAYMIRE: Yes, and I'll show you
2 the screenshot. I'll call that Defense
3 [Exhibit 1](#). There it is.
4 (Whereupon, Defense [Exhibit Number 1](#)
5 was presented and identified for the
6 record.)
7 BY MR. WAYMIRE: (Resuming)
8 Q. All right. So have you seen a video that looks
9 kind of like this?
10 A. Yeah.
11 Q. You have? And there's a person in that screenshot.
12 Who's that person?
13 A. That's me.
14 Q. Got it. All right. I'm going to get you to use
15 your artistic skills briefly.
16 (Whereupon, a document marked as
17 Defense [Exhibit Number 2](#) was presented
18 and identified for the record.)
19 BY MR. WAYMIRE: (Resuming)
20 Q. I have here what I'm going to call Defense Exhibit
21 2, and I've drawn a rough layout of what I think the cell is
22 like, based on the screenshot. Okay? I could have gotten
23 the dimensions wrong. I probably did. I could have gotten
24 other things wrong. All I'm wondering about is where is
25 the -- the door. Where is the telephone located in the cell,

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1 and where is the intercom button located? That's what I'm
2 interested in, okay? And if you think that, you know, my
3 picture here is really, really messed up, you can draw your
4 own. Okay. But here's Defense [Exhibit 2](#). Take a look at
5 it. It's designed to be an overview of how that cell is
6 configured. Do you agree with that?
7 A. No.
8 Q. You don't? Okay. What's wrong with it?
9 A. Uh, it's missing the button, the phone, and the
10 other bench.
11 Q. Got it. All right. So why don't you draw those in
12 for us and label them.
13 A. I can't.
14 Q. You can't?
15 A. I can't hold -- I can't write and stuff.
16 Q. You can't write? What's wrong?
17 A. My hand's messed up.
18 Q. Was that -- Does that have anything to do with the
19 incident we're -- we're --
20 A. No.
21 Q. -- that you filed your lawsuit about?
22 A. No.
23 Q. Is that an injury of some sort?
24 A. Yeah.
25 Q. What was that from?

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1 A. Uh, an accident.
2 Q. When did that happen?
3 A. Recently.
4 Q. What kind of accident was it?
5 A. Um, a bad one.
6 Q. Was it something where you, like, hit a wall or
7 something like that?
8 A. Uh, yeah.
9 Q. Why don't you just lay out what happened. Just --
10 Just give us the 30-second version of what happened.
11 A. Um, 30-second version. I was locked in a small
12 room, and I was begging for water, and they brought me water,
13 and then they tried to shoot me up with drugs. I told them I
14 couldn't take the drugs because I was allergic to them. They
15 shot me up with the drugs anyways and, uh, I pretty much
16 blacked out, and then I woke up with my hand getting stitched
17 back together.
18 Q. So you don't know exactly what caused your hand to
19 be harmed?
20 A. I do know what happened.
21 Q. Oh. What happened?
22 A. I punched -- I punched the wall but --
23 Q. You punched the wall.
24 A. -- I wasn't in control, like, it was hazy.
25 Q. How long ago did that happen?

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1 A. A couple months ago.
2 Q. Where was it?
3 A. The hospital.
4 Q. Hospital? Which hospital?
5 A. Rockdale.
6 Q. Rockdale Hospital? Okay. Fair enough. All right.
7 So you're telling us that your hand, your right hand --
8 you're right-handed; is that correct?
9 A. Yeah.
10 Q. Okay. And that's what you would normally draw with
11 so --
12 A. Yeah.
13 Q. -- why don't you tell me then.
14 A. It just hurts my hand. I could try my left hand,
15 but it cramps my fingers.
16 Q. I'll draw for you. You can -- You can just point
17 it out then. All right.
18 A. That's a button (indicating.)
19 Q. All right. So there's a call button. I'm just
20 going to put a little box here and label it call button. So
21 did I label that correctly?
22 A. Yeah.
23 Q. Got it. All right.
24 A. That's a bench (indicating.)
25 Q. All right. And so there's a bench --

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1 A. No.
2 Q. Oh, sorry.
3 A. It starts there (indicating.)
4 Q. All right. And it goes to what, this wall?
5 A. It goes to here.
6 Q. So that's it, right?
7 A. I think that's right. That looks about right.
8 Q. All right. So I drew in another bench. You agree
9 with that?
10 A. Yeah.
11 Q. All right. And then there's a telephone somewhere.
12 Why don't you tell me --
13 A. Right here (indicating.)
14 Q. -- where the telephone is. All right. I'm going
15 to draw another box and label it telephone. So you agree
16 with all the labeling there?
17 A. Yeah, it looks about right.
18 Q. Got it. All right. That's Defense Exhibit 2. In
19 connection with this incident that you sued about, have you
20 made any kind of notes, writings, whether you typed it,
21 whether you hand wrote it, anything of that nature? It might
22 be an email. It might be in a journal. It might be a text
23 to somebody. It might be a Facebook post.
24 A. Do you mean notes? What do you mean?
25 Q. I mean, have you -- have you written anything

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1 whatsoever, put in writing, anything about what happened in
2 this incident or how it affected you?
3 A. Uh, unless me and my lawyer have emailed about
4 anything. No, I don't believe so.
5 MR. SLATER: He's not asking about
6 anything
7 MR. WAYMIRE: Yeah, don't --
8 MR. SLATER: -- between us or
9 anything between your lawyers.
10 BY MR. WAYMIRE: (Resuming)
11 Q. Yeah, so let me make that clear.
12 A. No.
13 Q. I'll exclude, yeah, writings to lawyers between you
14 and your three lawyers.
15 A. No.
16 Q. All right. So yeah, so there's -- To be clear,
17 there's no journals that you wrote, true?
18 A. True.
19 Q. All right. No email, correct? Didn't text anybody
20 about anything; is that correct?
21 A. Yes.
22 Q. All right. Facebook, do you have any social media
23 accounts?
24 A. Yeah.
25 Q. And what are they?

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1 A. What are they?
2 Q. Yes.
3 A. They're my name.
4 Q. So if I wanted to go visit your social media
5 account, you have what, Facebook?
6 A. Yeah.
7 Q. What else?
8 A. Uh, that's the only one that's active.
9 Q. Okay. And what's the name under which -- Ezra
10 Smith?
11 A. Yeah.
12 Q. Is it like Ezra, under dash, Smith or any kind of
13 thing like that?
14 A. No.
15 Q. Just Ezra Smith? Do you have just one account on
16 Facebook?
17 A. Yeah.
18 Q. All right. And is it public or is it private?
19 Like, can anybody go to it and visit it and look at it?
20 A. Uh, I don't think -- Maybe. I don't recall.
21 Q. Okay. Have you -- Let me ask it this way. Was
22 there anything that you wrote in the past that existed then
23 about the incident or how it affected you, but somehow it
24 went away? It doesn't exist anymore?
25 A. No.

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1 Q. I have a little bit of information about your work,
2 your work history. I understand that now you work at, or at
3 least as of a certain -- certain time frame in the recent
4 past, you worked for some type of a concrete company?
5 A. Yeah.
6 Q. Key Curbing and Paving?
7 A. Yeah.
8 Q. Is that still true?
9 A. No.
10 Q. When did you stop working for them?
11 A. Uh, I don't recall.
12 Q. Was it months ago?
13 A. Yeah.
14 Q. Pretty recently?
15 A. A couple months ago. I don't recall. Before July.
16 Q. Before July of 2025?
17 A. Yeah.
18 Q. Okay. And then, before that you worked for Paws,
19 Whiskers and Wags. Is that a, like, an animal shelter?
20 A. No.
21 Q. Is it a -- What is it?
22 A. It's a crematorium.
23 Q. Crematorium?
24 A. Yeah.
25 Q. For -- For animals?

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1 A. Yeah.
2 Q. Okay. Okay. All right. And then --
3 MR. BUCKLEY: Said that like you
4 didn't know those exist.
5 MR. WAYMIRE: Well --
6 THE WITNESS: Hey, man, that's a
7 real job, dude. People need, someone has
8 to do it.
9 MR. WAYMIRE: Hey, I agree. It's
10 honest work.
11 BY MR. WAYMIRE: (Resuming)
12 Q. All right. American Kidney Foundation in 2023?
13 A. Yeah.
14 Q. Okay. So in terms of actual earned income, were
15 those all hourly wage jobs?
16 A. Uh, not American Kidney.
17 Q. Was American Kidney -- What was that? Was that a
18 salary job?
19 A. Uh ...
20 Q. Or just volunteer?
21 A. Uh, half salary, half volunteer.
22 Q. Half salary, half volunteer. If you had to
23 estimate your annual income for 2024, what would it be?
24 A. Oh, for 2024?
25 Q. Yeah. If you put all your income together.

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1 A. Maybe 10,000.
2 Q. All right. Did you file taxes for year 2024?
3 A. Yeah.
4 Q. Was that roughly what your tax return said, that
5 you made about \$10,000?
6 A. I don't remember. I just know they sent me money.
7 Q. All right. 2023, roughly about the same?
8 A. I think I made like twenty thousand in 2023, maybe
9 thirty.
10 Q. Do you get public support, like welfare of any
11 sort, food stamps, anything like that?
12 A. I get food stamps.
13 Q. Food stamps? Okay. Anything else? Medicare?
14 Excuse me, Medicaid, I assume she does.
15 A. No.
16 Q. You've told us about certain mental health
17 diagnoses, for example, schizoaffective disorder, major
18 depression disorder. I think I might have seen in the
19 records of ADHD as well.
20 A. Yes.
21 Q. Okay. Do you believe that any of those conditions
22 cause you to be unable to control yourself?
23 A. In what way?
24 Q. In other words --
25 MR. SLATER: Object to the form.

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1 BY MR. WAYMIRE: (Resuming)
2 Q. In other words, make your own decisions that are
3 your decisions.
4 MR. SLATER: Object to the form.
5 BY MR. WAYMIRE: (Resuming)
6 Q. You can answer.
7 THE WITNESS: What do you -- What
8 do you say that for, if I'm still
9 supposed --
10 MR. SLATER: I'm objecting to his
11 question, but you still -- you still have
12 to answer his question.
13 THE WITNESS: What's objecting to it
14 do then?
15 MR. SLATER: It's for the record
16 later. You don't have to worry about it,
17 Ezra.
18 MR. WAYMIRE: It's a judge -- judge
19 and lawyer thing.
20 MR. SLATER: Yeah.
21 THE WITNESS: Oh, okay. So what's
22 the question?
23 BY MR. WAYMIRE: (Resuming)
24 Q. All right. So here's -- here's an idea. Somebody,
25 some people in some circumstances might say, well, yeah, I

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1 did that thing, or I said that thing in the past, and it
2 really wasn't me. I couldn't even control it. It was some
3 kind of mental condition that I had, okay? I'm just giving
4 an example. Like -- Like if somebody did a crime and then
5 raised the insanity defense.
6 A. No.
7 Q. You see? That's -- That's the gist of my
8 question.
9 A. I could control my -- I mean, you know, people have
10 a, you know, like push, you know what I'm saying? I like,
11 you know, but like I typically -- typically feel like I'm in
12 control of my own actions. I feel like I am, but you know,
13 outside factors do, you know, help sway my opinions and
14 emotions and actions, you know.
15 Q. Sure. So moving to July 8th and 9th of 2024, was
16 there some kind of influence on you, whether from a mental
17 health condition or anything else, that affected your ability
18 to make your own decisions?
19 A. Yes.
20 Q. What?
21 A. Uh, she's telling me to kill myself.
22 Q. So Tracey telling you to kill yourself somehow
23 affected your decision-making process so that you weren't in
24 control anymore, and you're not responsible; is that right?
25 MR. SLATER: Object to the form.

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1 THE WITNESS: (Resuming)
2 A. Um, I believe I'm still in control, but like I
3 said, her, you know, what she says and stuff impacts the way
4 that I think about myself, my life, and the situation, so ...
5 Q. We know about three incarcerations at Rockdale
6 County. One in November '22, one in May '24, one in July of
7 '24. You've told us about one incident with Tracey, you
8 think with Tracey, in one prior incarceration. By prior, I
9 mean before July 8th, 9th of 2024. So it -- it involved
10 comments about a haircut, right? That's what you think?
11 A. If it was her, yeah.
12 Q. Sure, sure. So I'm wondering, are there -- is
13 there anything else from November, the November '22
14 incarceration, or the May 2024 incarceration, where you had
15 some kind of interaction with Tracey that you actually
16 remember?
17 A. No.
18 Q. Okay. So other than, you know, the haircut
19 incident, which seemed like a pretty -- pretty plain vanilla
20 sort of thing, the first time you had anything that you
21 would -- you would call an altercation with Tracey would have
22 been July 8th, 9th of 2024.
23 A. Yeah.
24 Q. Okay. Let's talk about the, I'll call it the first
25 intercom call. I think it was during the day of July 8th of

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1 2024 when other inmates were in the holding cell with you.
2 A. Uh-huh (affirmative).
3 Q. So you know what I'm talking about?
4 A. Yeah.
5 Q. All right. So there's an intercom call that
6 somebody else makes, correct?
7 A. Yeah.
8 Q. And the report over the intercom is by some other
9 inmate, correct?
10 A. Yeah.
11 Q. And what does that other inmate say?
12 A. I don't know.
13 Q. Okay. Was it something about somebody being
14 suicidal?
15 A. I don't remember the exact words.
16 Q. Did you make any statement over the intercom on
17 that occasion?
18 A. No.
19 Q. Did you make any kind of gesture or something that
20 was -- that was intended to communicate to an officer on that
21 occasion?
22 A. Not that I recall.
23 Q. So here's -- here's my information, is that
24 somebody says, hey, this white guy says he wants to commit
25 suicide. And then the information is you're, you know,

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1 you're shrugging and -- and saying no with your head, and
2 maybe giggling and laughing like, no, no, no, I really don't.
3 That's -- That's -- That's the information I've got. Is
4 that true or not?
5 A. Not that I recall.
6 Q. Do you have a real recollection about what happened
7 there?
8 A. About in that exact moment, no.
9 Q. All right. So you just don't remember one way or
10 another; is that right?
11 A. Uh, not what exactly happened in that moment, no.
12 Q. Okay. If I recall your testimony earlier, on that
13 occasion you were -- you were just kidding; is that right?
14 A. Uh, like I said, it was -- to me it was formed as a
15 joke. But again, I also stated that there's a little truth
16 to every joke, so I mean ...
17 Q. So let me move then to the discussion you had later
18 in the night with Deputy Tracey. You said it lasted about a
19 minute, correct?
20 A. (Nonverbal response.)
21 Q. Yes?
22 A. Uh, yeah.
23 Q. And Tracey, you think, was responding to you
24 kicking the door, yelling, and banging your head; is that
25 right?

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1 A. Yeah.

2 Q. Okay. You told us three things that -- that you

3 definitely recall you said to her, why you weren't -- You

4 asked why you hadn't been processed; you said you'd been

5 there a long time; and you wanted to make a phone call,

6 right?

7 A. Yes.

8 Q. So those are things you definitely remember

9 clearly?

10 A. Yes.

11 Q. All right. And then the rest of the discussion, it

12 seemed like your memory is less crisp, less clear; is that

13 true?

14 MR. SLATER: Object to the form.

15 THE WITNESS: (Resuming)

16 A. Um, no.

17 Q. Okay. So you have a crystal clear --

18 A. No, no.

19 Q. -- memory about the rest of the discussion?

20 A. No.

21 Q. All right. So it seemed to me, when I listened to

22 your testimony earlier, that you were giving us certain

23 fragments and the gist of what was said, but not verbatim

24 quotes; is that right?

25 A. Yeah.

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1 Q. Okay. You mentioned that Deputy Tracey made some

2 kind of a, forgive me, I don't remember your specific words,

3 but it was a crazy motion or something like that, with the

4 finger?

5 A. Yeah.

6 Q. Can you show us that?

7 A. I did earlier.

8 Q. You did earlier? I'm sorry. I missed that. Do

9 you -- Do you mind showing us?

10 A. She was like (demonstrating with finger.)

11 Q. All right. So she was twirling the finger around.

12 A. Yeah. Yeah, yeah. She was like, your mom is

13 (gesturing.) Yeah, like --

14 Q. I see.

15 A. -- when she was talking about my mom. Yeah.

16 Q. I see. Would you agree that you were angry in that

17 discussion?

18 A. Um, no.

19 Q. You were angry before the discussion?

20 A. No.

21 Q. So would you say that when you're kicking the door

22 and banging your head and yelling, you're not angry at all;

23 is that right?

24 A. No, I never said I did that. I didn't kick the

25 door, bang my head, and yell.

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1 Q. Okay. Which -- Which of those did you do before

2 Tracey ever showed up at the door?

3 A. I kicked the door.

4 Q. You kicked the door.

5 A. Yeah.

6 Q. But you weren't angry at all?

7 A. No.

8 Q. Okay. Did you tell Tracey, it doesn't have to be a

9 direct quote, okay? I don't know verbatim either because I

10 wasn't there. But did you tell her anything to the effect

11 that you -- you would beat her or attack her or whip her butt

12 or anything like that?

13 A. No.

14 Q. Nothing like that?

15 A. No.

16 Q. Nothing aggressive, no threats?

17 A. No.

18 Q. Okay. Did you tell her to open the door?

19 A. No.

20 Q. Okay. Did you use any racial slurs whatsoever?

21 A. Definitely not.

22 Q. Okay. Do you know what I mean by racial slurs?

23 A. Yes.

24 Q. All right. So there is one that starts with N

25 that's particularly --

Page 152

1 A. Which one?

2 Q. -- problematic.

3 A. Which one?

4 Q. It rhymes with "bigger," okay, and it starts with

5 N. Did you say that word?

6 A. No.

7 Q. Okay. Did you use any kind of racial slur

8 whatsoever?

9 A. No.

10 Q. Okay. After the incident, in talking with anybody,

11 did you use any kind of racial slur with regard to Deputy

12 Tracey?

13 A. No.

14 Q. Or with regard to any other officer?

15 A. No.

16 Q. I wasn't clear about how the idea of suicide got

17 into your discussion with Tracey. Was that something that

18 she brought up first? Or something that you brought up

19 first?

20 A. Um, I don't recall.

21 Q. Do you have any idea about what triggered you to

22 say anything about you're suicidal?

23 A. Yeah.

24 Q. What?

25 A. Um, it could have something to do with she was

Page 153

1 talking about my mom, and, you know, what she, you know, was
2 telling me, like -- I don't know. I was in there alone, and
3 that was upsetting me. And then she started talking about my
4 mom and how she spoke to my mom, and that upset me. And
5 then, you know, she started talking about how she knew
6 everything about me. And, uh, from what I think I -- from
7 what I think I remember was, I feel like I remember her
8 saying, I talked to your mom and I know everything about you
9 and I think you should kill yourself. That's how I remember
10 it, and you know, that's -- I think that's what I remember
11 being the first one to say it. I mean, unless I did come up
12 to her and say I was suicidal. But, you know, I know it had
13 something to do with just the back and forth and being alone
14 in the cell, and then her also telling me that I was going to
15 be stuck in there for several more hours if I didn't kill
16 myself. And so it was just kind of things like that were,
17 like, really driving the point home. It was just like ...
18 **Q. It seems to me this is the second time that you've**
19 **ever met Tracey; is that right?**
20 A. From what I think I remember, yeah.
21 **Q. So I'm wondering, how is it that Tracey has such an**
22 **influence over you at this point that you're going to do what**
23 **she says?**
24 A. How?
25 **Q. Yeah.**

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1 A. Uh, she has me locked in a small room. I guess a
2 big room. She has me locked in a room.
3 **Q. So you're going to do anything she says?**
4 A. I mean, I don't got much of a choice.
5 **Q. So if she told you to strip off all your clothes,**
6 **is that what you were going to do?**
7 A. They had already told me to do it once.
8 **Q. If she told you to do a handstand or, you know,**
9 **walk around on all fours like a dog, is that what you were**
10 **going to do?**
11 A. I might, like, if I had to, like, with the way she
12 was making it come off, then yes. If that was my only way to
13 get out of that cell, then yeah, absolutely. If that was the
14 only way I would ever find my way out of that cell, which was
15 what she was making me believe, then absolutely. I would
16 have crawled around like a dog. I would have walked over and
17 lapped up toilet water out of the bowl if that meant that I
18 wouldn't be locked in that small room anymore by myself.
19 Absolutely.
20 **Q. Okay. Would you agree that adult people are**
21 **responsible for their own decisions?**
22 A. Yeah.
23 **Q. Would you agree that adult people should be held**
24 **responsible for their own decisions?**
25 A. Yes.

Page 155

1 **Q. Okay. Is it fair to hold adult people responsible**
2 **for their own decisions?**
3 A. Yes.
4 **Q. Are adult people responsible for their own actions?**
5 A. Yes.
6 **Q. Should adult people be held responsible for their**
7 **own actions?**
8 A. Yes.
9 **Q. Is it fair to hold adult people responsible for**
10 **their own actions?**
11 A. Yes.
12 **Q. On the night of this incident, you were 23 years**
13 **old?**
14 A. Yes.
15 **Q. You were a grown man?**
16 A. Yes.
17 **Q. Is there any reason you were not responsible for**
18 **your own decisions that night?**
19 A. I am.
20 **Q. Is there any reason you were not responsible for**
21 **your own actions that night?**
22 A. I am.
23 **Q. Were you under the influence of drugs?**
24 A. No.
25 **Q. Were you under the influence of alcohol?**

Page 156

1 A. No.
2 **Q. Do you claim that you were under the influence of**
3 **anything else?**
4 A. No.
5 **Q. In that cell, you decided to put the phone cord**
6 **around your neck, right? That was your decision?**
7 A. Yeah.
8 **Q. And you decided to make the phone cord tight?**
9 A. Yeah.
10 **Q. Okay. Before you passed out, you could have**
11 **loosened the phone cord at any point?**
12 **MR. SLATER: Object.**
13 **THE WITNESS: (Resuming)**
14 A. No.
15 **Q. Explain that.**
16 A. I mean, you pass out pretty fast.
17 **Q. My question was, before you passed out, you could**
18 **have loosened the phone cord?**
19 A. Yeah.
20 **Q. And all those were your decisions, correct?**
21 A. Yeah.
22 **Q. All right. You were a hundred percent responsible**
23 **for every one of those decisions?**
24 A. No.
25 **Q. Explain that.**

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1 A. Well, you know, every action has a reaction, so
2 50-50, you know what I'm saying? She takes responsibility in
3 the actions that happened that night, too. She has to take
4 responsibility for her actions and her words, the things she
5 said and did, you know what I'm saying? She needs to hold
6 herself responsible. She needs to be held accountable and
7 responsible for her actions. So yeah, I -- I agree with
8 everything you said to begin with, and it goes both ways.
9 No, I'm not a hundred percent to blame for what happened. I
10 mean, she -- she does have half the blame. When somebody's
11 in a state of duress, you can't just run up to them and tell
12 them to kill themselves. That's ridiculous. You can't have
13 someone locked in a room in a state of duress and then shove
14 in their head that the only way they'll ever get out is to
15 kill themselves, you know what I'm saying? That's not -- At
16 that point that's not you making your own decision. That's
17 you following the only ultimatum you've been given, and you
18 have no choice but to follow it. So it was either kill
19 myself -- Her exact words was, I either kill myself or I
20 spend as many hours as she sees fit rotting in that cell.
21 She wouldn't tell me how long I was going to be in there, how
22 long I wouldn't be in there, so ...
23 Q. Are you making up that last part about something
24 she said?
25 A. No.

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1 Q. Or do you really remember that?
2 A. I remember that. I stated that before.
3 Q. Okay. So you think it's 50-50 between you and
4 Tracey?
5 A. I mean, maybe. I don't ... I guess.
6 Q. Do you realize that Deputy Tracey helped save your
7 life?
8 A. No.
9 Q. Do you -- You don't realize that?
10 A. She didn't.
11 Q. Well, actually, yes, she did. She discovered you,
12 she called help, and your life was saved. Do you disagree
13 with that?
14 A. That's not doing anything.
15 Q. What are you talking about, that's not doing
16 anything?
17 A. She told me to kill myself, and so when she found
18 me dead, she yelled for help. That's not helpful.
19 Q. Tracey went into that cell, and she saw you with a
20 cord around your neck, and you're alive today because she saw
21 you and reacted. Do you realize that?
22 A. I was only in that position because she told me to
23 do it.
24 Q. Yes or no, do you realize that Tracey's actions
25 helped save your life?

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1 A. I disagree.
2 Q. Okay. Do you realize that Deputy Jackson helped
3 save your life?
4 A. Okay.
5 Q. Do you believe that or not? Yes? No? Deputy
6 Jackson did CPR on you to help save your life.
7 A. So Tracey yelled for help, and Jackson did CPR?
8 Q. Yeah. There's a video about it, and it's going to
9 do a better job than me, and I'm not here to answer
10 questions, okay? But I'll tell you that Jackson did CPR on
11 you and helped save your life. Do you realize that?
12 A. Okay.
13 Q. Nurse Sanchez helped save your life. Do you
14 realize that?
15 A. Okay.
16 Q. Agree? Disagree?
17 A. I mean, I don't agree with any of them. I don't
18 think any of them helped me.
19 Q. You don't think anybody helped save your life?
20 A. Not any of those people you're naming.
21 Q. Okay. Explain that.
22 A. I mean, you're not helping save a life if you're
23 the one that helped take it. I mean, it don't make much
24 sense.
25 Q. Well, somebody doing CPR and bringing you, you

Page 160

1 know, back to breathing when you weren't breathing is saving
2 your life, right?
3 A. I mean, like, no. No.
4 Q. Are you in any sense grateful to any of those
5 people for helping to save your life?
6 A. Which people?
7 MR. SLATER: Objection.
8 BY MR. WAYMIRE: (Resuming)
9 Q. The people that helped save your life.
10 A. Which ones? The people --
11 Q. Tracey --
12 A. -- that saved my life, yes.
13 Q. Tracey, Jackson, Sanchez.
14 A. No.
15 Q. Not to any of them?
16 A. The people that saved my life, I'm eternally
17 grateful for.
18 Q. And those are?
19 A. Uh, uh, I don't remember what his name was, but I
20 was told the one that gave me CPR was the big white dude.
21 Um, I think -- I think the doctors at the hospital for all
22 the tests they did, you know what I'm saying? I think all
23 those people. I think the first responders, the paramedics;
24 I'm thankful to those people. I'm thankful to, you know, we
25 called him New York. I was thankful for him. I feel like he

Page 161

1 helped save my life. I'm thankful to the people that helped
2 save my life, but not for the people that did it to me.
3 Q. So you're excluding Sanchez from people who saved
4 your life when Sanchez is the one who started CPR on you; is
5 that right?
6 A. So was it, uh, was it Sanchez that started the CPR?
7 I thought --
8 Q. That's what the video -- That's what it looks like
9 to me on the video.
10 A. I thought you said someone else started CPR.
11 Q. Jackson did CPR, too. There were different people
12 doing CPR.
13 A. You said Jackson started the CPR. You said Tracey
14 yelled for help and then Jackson came in and started CPR.
15 Q. We can watch the video, but different people did
16 CPR and helped save your life.
17 A. Okay.
18 Q. Among them, Jackson and Sanchez.
19 A. Okay.
20 Q. Are you at all grateful to those people?
21 MR. SLATER: Objection.
22 THE WITNESS: (Resuming)
23 A. No.
24 Q. Why not?
25 A. Because they didn't -- they didn't help.

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1 Q. Oh, okay. Did you ever say thank you to anybody
2 for helping save your life?
3 MR. SLATER: Objection.
4 THE WITNESS: (Resuming)
5 A. No.
6 Q. Do you want to say thank you now?
7 A. No.
8 Q. Yeah, I didn't think so.
9 MR. WAYMIRE: Okay. That's all my
10 questions.
11 MR. SLATER: Do you have anything
12 else, Tim?
13 MR. BUCKLEY: I do.
14 MR. SLATER: All right. Go ahead.
15 MR. BUCKLEY: Are you going to ask
16 anything?
17 MR. SLATER: I'm going to ask a
18 couple, but you go first.
19 RE-EXAMINATION
20 BY MR. BUCKLEY:
21 Q. Your current girlfriend, are you still boyfriend
22 and girlfriend with the girlfriend that you were with when
23 you attempted suicide this year?
24 A. Yeah.
25 Q. All right. What's her name?

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1 A. Monica.
2 Q. Monica what?
3 A. Delamonica.
4 Q. Delamonica? Monica Delamonica? Okay. And what's
5 her phone number?
6 A. I don't know. I don't know.
7 Q. You don't know? Do you have a phone with you?
8 A. No.
9 Q. Do you have a phone?
10 A. Yeah.
11 Q. All right. Do you have her phone number in your
12 phone?
13 A. Yes.
14 Q. All right. Is your phone here in the building?
15 A. No. Oh, yes.
16 Q. Okay.
17 A. It's in the building.
18 Q. All right. Are you willing to take a break and get
19 it? Or are you willing to give that phone number to your
20 lawyer after we get off the record?
21 MR. SLATER: I can -- I can get the
22 number if you need it.
23 MR. BUCKLEY: All right.
24 BY MR. BUCKLEY: (Resuming)
25 Q. Your wife, what is her name?

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1 A. Brianna.
2 Q. Brianna what?
3 A. Smith.
4 Q. Smith?
5 A. Uh-huh (affirmative). Yeah.
6 Q. And do you know her phone number?
7 A. No.
8 Q. Is it in your phone?
9 A. No.
10 Q. Is it in your records somewhere?
11 A. No.
12 Q. All right. You don't have it anywhere?
13 A. No.
14 Q. Okay. Who is your best friend?
15 A. My best friend?
16 Q. Other than your girlfriend.
17 A. I can't say that I have one.
18 Q. You don't have any friends?
19 A. Not really.
20 Q. Okay. Would you agree with me that in July of
21 2024, you were suicidal, but that it's your view that what
22 Deputy Tracey said to you made you attempt it?
23 A. Yeah.
24 Q. Okay. But she didn't make you suicidal; you came
25 that way, right?

Page 165

1 A. Yeah.

2 Q. All right. Now, as far as the putting the cord

3 around your neck in that holding cell, was it the same

4 holding cell you had done that in 2022 in?

5 A. No.

6 Q. But the same setup, phone with a cord, right?

7 A. Yeah.

8 Q. All right. And if I understand your testimony,

9 you're saying that Deputy Tracey wanted you to kill yourself,

10 right?

11 A. Yeah.

12 Q. But factually, I'll represent to you that she's the

13 one who discovered you, called for help, and you were revived

14 based on that call, okay? I want you to assume those facts.

15 A. Uh-huh (affirmative).

16 Q. All right. Wouldn't you agree with me she had the

17 option to let you just perish without calling for help?

18 MR. SLATER: Object to the form.

19 THE WITNESS: (Resuming)

20 A. No.

21 Q. How so?

22 A. 'Cuz she knew she was risking her job and her

23 freedom.

24 Q. Okay. So by telling you, go ahead and kill

25 yourself, she wasn't creating any risk to her job?

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1 A. Oh, she was.

2 Q. Yeah. Okay. So what's the difference between that

3 and just letting you die once you tried to attempt suicide if

4 she wanted you dead?

5 A. Because she didn't think I was going to do it,

6 probably.

7 Q. Oh, okay. So your thought is she said that to you,

8 but she didn't think you'd try it.

9 A. I don't know.

10 Q. Well, no, you just testified to that. So what is

11 your testimony?

12 A. I don't know what she thought. I'm not her. I

13 don't know if she thought I was going to do it, if she

14 thought she was just going to beat me down, maybe she thought

15 I was going to do it later. Maybe it just made her feel good

16 to make me feel that way. I don't know what she thought, you

17 know what I'm saying? But maybe she did think I was going to

18 do it. Maybe she was hoping I'd be dead by the time she came

19 back. Maybe she was thinking I was dead, you know what I'm

20 saying? By that point, I'd already went through the stages

21 of dying, you know what I'm saying? Hell, I shit and pissed

22 myself and my nose was bleeding, you know, blood vessels in

23 my eyes had exploded. I wasn't moving, I wasn't breathing

24 whatsoever, no heartbeat. They had to give me CPR for a long

25 time. So I'm sure when she looked in that cell deep in her

Page 167

1 heart, she probably did know and she probably was actually

2 hoping I was there just long enough to fully be dead. So

3 when she called for help, instead of attempting CPR on me, so

4 when she opened that door and she looked at my dead body and

5 she said, somebody come help. He's dying, or he's dead. Oh,

6 my God. And then she sat there and watched and she just

7 watched until somebody else came in and then performed CPR on

8 me. Like, I mean, like ...

9 Q. Are you through?

10 A. Yeah.

11 MR. BUCKLEY: I'll move to strike

12 that as unresponsive, but I'll also --

13 MR. WAYMIRE: I join.

14 BY MR. BUCKLEY: (Resuming)

15 Q. Yeah. I'll also point out there's a video. Have

16 you watched the video and come up with that story?

17 A. Yeah.

18 Q. Okay.

19 A. No.

20 Q. No?

21 A. No, I -- I come up with that story after his story,

22 what he's telling me.

23 Q. Okay. So you haven't watched the video --

24 A. I've watched the video.

25 Q. -- as a basis for that.

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1 A. No, not off a basis for what I just said.

2 Q. Right. Okay. Understanding your testimony about

3 Tracey, you don't hold the opinion that Deputy Jackson wanted

4 you dead, do you?

5 A. No.

6 Q. All right. She performed CPR on you once she was

7 made aware that you were unresponsive. Did you know that?

8 A. From what I've been told.

9 Q. Okay. So do you appreciate her reviving you?

10 MR. SLATER: Objection.

11 THE WITNESS: (Resuming)

12 A. Yeah.

13 MR. BUCKLEY: Okay. I don't have

14 anything else at this time.

15 MR. SLATER: Okay. Are you done,

16 Jason?

17 MR. WAYMIRE: I'm done.

18 MR. SLATER: Antonio?

19 MR. VEAL: Yeah, I'm good.

20 MR. SLATER: Okay. Okay. And I

21 just have a couple of things.

22 EXAMINATION

23 BY MR. SLATER:

24 Q. Mr. Smith, you -- you testified today about what

25 you and Ms. -- or Deputy Tracey discussed on the night of

Page 169

1 July 8th leading into July 9th of 2024, right?

2 A. Yeah.

3 Q. Okay. And I -- And I understand from your

4 previous testimony that some of it, it sounded like you were

5 very clear about the exact words that were said, right?

6 A. Yeah.

7 MR. BUCKLEY: Object to form.

8 Leading.

9 MR. WAYMIRE: Join.

10 BY MR. SLATER: (Resuming)

11 Q. And some of these -- some of these questions, I

12 believe you testified that you were not so sure about, right?

13 MR. BUCKLEY: Object to form.

14 Leading.

15 MR. WAYMIRE: Join.

16 THE WITNESS: (Resuming)

17 A. Yeah.

18 Q. You can answer. Okay. And I believe you said

19 something to the effect of at one point that you were

20 speculating, right?

21 MR. BUCKLEY: Same objection.

22 THE WITNESS: (Resuming)

23 A. Yeah. Yeah.

24 Q. Okay. When you said that, were you -- you didn't

25 mean that you were making it up, right?

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1 MR. BUCKLEY: Same objection.

2 THE WITNESS: (Resuming)

3 A. Yeah.

4 Q. Okay. What did you mean when you said you were

5 speculating?

6 A. Um, just going based off of what I remember.

7 Q. Okay. But you -- you didn't mean that those

8 conversations didn't occur, right?

9 A. Right.

10 MR. WAYMIRE: Objection. Leading.

11 BY MR. SLATER: (Resuming)

12 Q. You were -- You were asked about some of these

13 officers resuscitating you or performing CPR or life-saving

14 measures on you. And you talked about, I think you said

15 something like, you know, they had caused -- maybe you

16 weren't appreciative because of what they had done. Could

17 you tell me a little bit more about that?

18 A. I mean, I'm not appreciative of Tracey. She's the

19 one that told me to kill myself, walking up to a door and

20 then yelling that somebody's dead isn't really saving their

21 life.

22 Q. Okay. What about the other officers who were there

23 and heard what was said?

24 A. I mean, I'm appreciative that they did something,

25 but they should have stepped in sooner.

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1 MR. SLATER: Okay. Nothing else.

2 MR. WAYMIRE: Okay. Off video at

3 4:22, and we're done.

4 MR. SLATER: All right. We'll read.

5 (Whereupon, the above-entitled

6 matter was concluded at 4:22 p.m.)

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CERTIFICATE OF COURT REPORTER

STATE OF GEORGIA)

COUNTY OF FULTON)

I, April D. Herbert, Certified Court Reporter, 2872

hereby certify that the foregoing transcript of deposition as

stated in the caption consisting of page 4 through 171, was

taken down by me and then transcribed under my supervision,

and that the same is a true, correct, and complete transcript

of the evidence given by the witness, who was first duly

sworn by me.

I further certify that I am a disinterested party to

this action and that I am neither of kin or counsel to any of

the parties hereto.

This certification is expressly withdrawn and denied

upon the disassembly or photocopying of the foregoing


transcript, unless said disassembly or photocopying is done

by the undersigned certified court reporter and original


signature and seal is attached thereto.

IN WITNESS WHEREOF, I hereby affix my hand on this the

29th day of October, 2025.

April Herbert 

April D. Herbert
 CERTIFIED COURT REPORTER, 2872

<div style="text-align: right;">Page 173</div> <div style="text-align: center;">DISCLOSURE</div> <div> STATE OF GEORGIA Deposition of COUNTY OF FULTON Ezra Smith </div> <p>Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:</p> <p>I am a Georgia Certified Court Reporter. I am here as an independent contractor.</p> <p>I was contacted by the offices of the taking attorney to provide court reporting services for this deposition. I will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 7.C.</p> <p>I have no contract/agreement to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition. I will charge its usual and customary rates to all parties in the case, and a financial discount will not be given to any party to this litigation.</p> <div style="text-align: center;">  <i>April Herbert</i> <hr/> April D. Herbert Certified Court Reporter, 2872 </div>																					
<div style="text-align: right;">Page 174</div> <div>10/15/2025/Smith/ADH/lky</div> <div style="text-align: center;">E R R A T A S H E E T</div> <p>I hereby certify that I have read the foregoing and within pages 4 through 171 and no changes are required:</p> <div style="text-align: center;"> <hr/> Ezra Smith </div> <p>Sworn to and subscribed before me this ____ day of _____, 2025.</p> <div style="text-align: center;"> <hr/> NOTARY PUBLIC </div> <p>My commission expires _____. *****</p> <p>I hereby certify that I have read the foregoing and within pages 4 through 171 and I wish to make the following changes:</p> <table border="0"> <tr><td>Page: _____</td><td>Line: _____</td></tr> <tr><td>Page: _____</td><td>Line: _____</td></tr> <tr><td>Page: _____</td><td>Line: _____</td></tr> <tr><td>Page: _____</td><td>Line: _____</td></tr> <tr><td>Page: _____</td><td>Line: _____</td></tr> <tr><td>Page: _____</td><td>Line: _____</td></tr> <tr><td>Page: _____</td><td>Line: _____</td></tr> <tr><td>Page: _____</td><td>Line: _____</td></tr> <tr><td>Page: _____</td><td>Line: _____</td></tr> <tr><td>Page: _____</td><td>Line: _____</td></tr> </table> <div style="text-align: center;"> <hr/> Ezra Smith </div> <p>Sworn to and subscribed before me this ____ day of _____, 2025.</p> <div style="text-align: center;"> <hr/> NOTARY PUBLIC </div> <p>My commission expires _____. *****</p>	Page: _____	Line: _____	Page: _____	Line: _____	Page: _____	Line: _____	Page: _____	Line: _____	Page: _____	Line: _____	Page: _____	Line: _____	Page: _____	Line: _____	Page: _____	Line: _____	Page: _____	Line: _____	Page: _____	Line: _____	
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